

THE NATIVE, OLD GROWTH FOREST ON MT. SPOKANE IS AT RISK AGAIN!



The Washington State Parks Commission is again ignoring the public and state agencies and proposing ski expansion into the irreplaceable old growth forest on the west side of the mountain.

As the Washington State Nature Heritage Program put it:

*“One of the greatest values of Mount Spokane State Park is its large size and low level of fragmentation of forests within its boundaries. Those mostly unfragmented forests extend from the southern tip of the park **north along the westerly slopes of Mt. Spokane** to forests off the park to the northeast.”*

We need ***you*** to ***voice your support*** for ***permanent protection***, as natural forest area, for this unique ecosystem.

Comments on the scope of an Environmental Impact Statement (EIS) are being taken until December

12th. Please ask that the EIS consider the following:

- The **Spokane County Critical Areas Ordinance** requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it should not be allowed.
- A **Master Concession Plan** was to be part of the Mt. Spokane Master Facility Plan, but has never been completed. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically.
- **Address concerns raised by the Spokane County Hearing Examiner when he ruled against a**

timber harvest permit earlier this year.

- **Analyze all the concerns raised by the Washington Dept of Fish and Wildlife (WDFW).**

- **Analyze all the concerns of the Department of Natural Resources' WA Natural Heritage Program** who favors protection as the Blanchard Creek Natural Forest.

- **Consult with WDFW and US Fish and Wildlife Service** on focal species, lynx, wolverine and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants.
- A **qualified biologist** should be consulted to delineate the location and impacts of the proposed development on wetlands and water courses. What are the impacts of snow-making to the above?
- **Analyze the impacts of leaving logging debris**, which can attract pine bark beetle and spread white pine blister rust?
- **Analyze the impacts on a rare species**, *Grylloblatta* now that an “independent expert” has determined that the populations deserve International Union for Conservation of Nature “Endangered” status. They have been found within the flagged line of the proposed chairlift.
- **Analyze the impacts on clearing, grading and exposing soil** that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation.
- **Analyze how expanding into the west** side of the mountain will extend the season and bring in more skiers when they have an underutilized north-side lift.
- **Analyze and determine the cost of adding intermediate runs** to the existing footprint as opposed to creating new ones.
- **Analyze the impacts of the loss of key corridors and core wildlife areas. How will they be mitigated?** What about direct loss of habitats for sensitive flora and fauna, can they be mitigated? What is the mitigation for the loss of biodiversity?
- **We support and want analysis of a no-action alternative** that will designate the proposed ski expansion areas (PASEA) area as Natural Forest Forest.
- **How will night time lights impact wildlife** and can you mitigate those for nocturnal species?

Comments are due no later than December 12, 2013 and can be sent to:

Washington Parks and Recreation Commission
 Attention: Randy Kline, Environmental Program Coordinator
 1111 Israel Road S. W., Olympia, WA 98504-2650
 Email: randy.kline@parks.wa.gov

Background:

Information on the Determination of Significance and Request for Comments on Scope of EIS is posted at <http://www.parks.wa.gov/plans/mtspokane2/>

Email Laura Ackerman at simahafarm@gmail.com for more information.



Comments: I am a hike leader for Inland Northwest Hikers Meetup Group and Ms. Adventures Meetup Group. We enjoy the pristine condition of the backside of Mt. Spokane and the current trail to the top. The diversity of plant and animal life would be disrupted by the addition of a ski run. These two groups represent over 1,000 hikers.
I would ask you to consider:

The impact of developing a ski area in the PASEA property should be evaluated based on its impact to all forms of non-motorized activity throughout the year - hiking, snowshoeing, cycling.

Analyzing the impacts on clearing, grading and exposing soil that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation. There is already a population of Knapweed in the disturbed areas of the mountain.

Analyzing the impacts of the loss of key corridors and core wildlife areas. How will they be mitigated? What about direct loss of habitats for sensitive flora and fauna, can they be mitigated? What is the mitigation for the loss of biodiversity?

I support and want analysis of a no-action alternative that will designate the proposed ski expansion areas (PASEA) area as Natural Forest Forest.

Inland Northwest Hikers Meetup Group Organizer
Ms. Adventures Meetup Group Organizer

Comments: I write to urge you to vote in favor of the expansion of the Mt. Spokane Ski & Snowboard Park and to refrain from adding any additional area within the ski area concession as Natural Forest Area (NFA) except for below the Chair 4 road. I have voiced my strong support many times before this body about the need and benefits of the expansion plan for the area's citizens and region and wish to reaffirm it today.

As a direct descendent of some of the original landowners who helped create Mt. Spokane State Park decades ago, I am excited about the expansion plans. My family gifted privately owned land to the park for the purpose of accessible recreation for the public. Today, that land is within the SW and SE Quarters of Section 9, comprising 320 acres located in the middle of the PASEA.

Years ago State Parks came to Spokane with the idea of classifying 20 percent of Mt. Spokane State Park as NFA and the Proposed Alpine Ski Expansion Area (PASEA) was considered to be part of that allocation. Citizens of Spokane strongly opposed this idea and the classification was tabled. Since then, State Parks has classified 28 percent of Mt. Spokane State Park as NFA (4,000 acres), nearly 50 percent more than its original classification intent. Therefore, Mt. Spokane State Park has achieved an acceptable balance between assessable recreation and preservation by already classifying enough land as NFA.

I do believe in protecting our forests, I also believe, as my ancestors did, that there is great value in accessible recreation. That is why Mt. Spokane State Park was created and is why it remains a valuable regional asset today. The founders entrusted all of us with a possession for a specific purpose - recreation.

Please affirm the ski area expansion area as described in the Mt. Spokane 2000 concession contract for recreational use. Now's the time to recognize that Mt. Spokane's ski and snowboard area is a winter playground serving tens of thousands of area residents, and to allow a well thought out plan to proceed.

A Historical Perspective on Mt. Spokane

At the 1927 dedication it was declared that the mountain would be "an outstanding all- year outdoor playground" for the citizens of Spokane. At least one deed (1929) states, "in event of the failure ...to use said lands for other than park purposes, the title to said lands...shall revert to the [Grantor's heirs]." Recreation and open public access, not stay-out preservation, was what these visionaries had in mind when they made these generous gifts of land to the State Park system.

In the 1930's, ski clubs organized to provide alpine and nordic skiing - one of the original plans was to drive to the top and ski down to the ticket office and chair lift. These clubs cooperated with other agencies to form the Mount Spokane Association, which "promotes and coordinates development of the state park as an outstanding all-year outdoor playground." It was on these northwest slopes under consideration for the ski area expansion where alpine ski operations originally began in the 1930's.

By the 1950's skiing had become very popular, the northwest slopes of Mount Spokane were where the original site of the first rope tows, lodges and improved trails were constructed on the mountain, as developed by various Spokane-area ski clubs, including the Selkirk Ski Club, the Spokane Ski Club and the Spokane Mountaineers. Prior to a 1952 fire, which destroyed a newly constructed lodge two weeks before its' opening, the PASEA included overnight and day-use lodge facilities, a parking area, three rope tows, night skiing and several ski trails.

The Spokesman-Review Charities also operated a ski school for children - any child who wanted to learn to ski, could, and Simchuck's Sporting Goods provided free boots and ski clothes if needed. 1,200 youngsters joined the school each year.

Today, Mt. Spokane has over 100,000 visitors annually enjoying accessible, affordable winter and summer recreational opportunities. It attracts tourism, and generates economic impacts through jobs.

Comments: When I got the message from the Parks department I had to stop and think. How many letters have I written? How many times have my friends written letters? This has gone on for many years. How many more letters should people write before someone at the Parks department finally listens? Maybe you have an answer but I do not.

I was at the Ski Patrol building working with the Patrollers in the frigid weather last weekend. Many Patrollers were talking about this same thing. They all concluded that the Parks department doesn't listen. We have sent a ton of letters, and have all gone to the many, many meetings that you have held. Every time the same message comes through. **PLEASE let the mountain develop the backside. We have 95% for the expansion and 5% against.** Yet these emails continue to come from the Parks Department.

People who have been to the mountain know what a good thing happens here. I learned to ski here. My children and grandchildren learned to ski here. I see many families coming to the mountain to enjoy this area. I see them in the summer, spring, fall and especially in the winter. The mountain management has made this area a wonderful place for all to enjoy.

Please stop this nonsense. We all hear it's passed and going through, then one or two people make frivolous complaints and it's stopped. How many times and how much money is going to be wasted? Please quit with all this. Don't you have more important things to spend your money on? We don't need more meetings, more discussions, more anything. I'll bet someone from your staff has all the data from the past meetings. Please read them. Everyone wants the whole back side to be developed. The Patrollers especially do. Skiers go back there now and when the Patrol has to go look for lost skiers they are put in danger.

I hope that someone reads my email, again and this time listens. Mt Spokane is a great place. The

Management and the staff work hard and make it that way. Tell the people who don't want it to come to the mountain. See how great it is.

Comments: Please accept the following Commentss regarding the proposed Mt. Spokane ski area expansion EIS. Specifically, I request that the EIS consider the following points:

- The **Spokane County Critical Areas Ordinance** requires mitigation and compensation of impacts caused by development. The loss of the largest remaining stands of ancient forests in Spokane County cannot be mitigated or compensated for, therefore it should not be allowed.
- A **Master Concession Plan** was to be part of the Mt. Spokane Master Facility Plan, but has never been completed. An economic analysis of the existing and proposed expanded ski area operation needs to be completed prior to completion of an EIS to determine if the proposed ski area expansion will even "pencil out."
- **Address concerns raised by the Spokane County Hearing Examiner when he ruled against a timber harvest permit earlier this year.**
- **Analyze and address the concerns raised by the Washington Dept of Fish and Wildlife (WDFW).**
- **Analyze the concerns of the Department of Natural Resources' WA Natural Heritage Program** that favors protection as the Blanchard Creek Natural Forest.
- **Consult with WDFW and US Fish and Wildlife Service** regarding impact on sensitive species, including lynx, wolverine and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants.
- **Request that a certified biologist** be consulted to delineate the location and impacts of the proposed development on wetlands and water courses, including the impacts of snow- making.
- **Analyze the impacts on rare species** located in the project area.
- **Analyze the impacts on clearing, grading and exposing soil** that will result in noxious weeds, sedimentation, and riparian damage - including to Blanchard Creek.
- **Analyze usage of the ski area: existing and with the proposed expansion.**
(The existing ski area is under-utilizing the existing runs, but is still pushing to expand runs into important habitat and watershed forests. Public monies would be better spent on upgrading existing facilities than in expanding the ski area to the west side of the State Park.)
- **Analyze and determine the cost of adding ski runs** to the existing footprint as opposed to creating new ones.
- **Analyze the impacts of the loss of key corridors and core wildlife areas, and explain how these losses will be mitigated.**
- **Include a no-action alternative** that will designate the proposed ski expansion areas (PASEA) area as a "Natural Forest".
- **Analyze the impacts of nighttime lights on wildlife, and how these impacts will be mitigated.**

Comments: Please do not ignore the public's and state agencies advising against the expansion. I am definitely NOT for the proposed ski expansion into the irreplaceable old growth forest on the West side

of the Mountain.

Consider the following:

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- Analyze the **impacts on clearing, grading and exposing soil** that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation.
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- We support and want analysis of a **no-action alternative** that will designate the

proposed ski expansion areas (PASEA) area as Natural Forest Forest.

- How will **night time lights impact wildlife** and can you mitigate those for nocturnal species?

Comments: Any decision by the Washington State Parks and Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: I highly oppose this proposition for expansion of the Mt. Spokane Ski Park, an avid skier myself I understand their motivation for expanding this area. The methods taken to do such work do not sit well with me, since my love for the outdoors/environment far exceeds that of love for the sport. Without further investigation and environmental impact studies I do not feel this expansion should proceed. We all have to follow processes and rules as the law requires and this should be no different.

Please consider the following:

The Washington State Parks Commission is again ignoring the public and state agencies and proposing ski expansion into the irreplaceable old growth forest on the west side of the mountain.

As the Washington State Nature Heritage Program put it:

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How will **night time lights impact wildlife** and can you mitigate those for nocturnal species?

Comments: I am in favor of classifying the whole PASEA as Recreation and allowing the Ski Area development to proceed. I have been following this process for a while, and may not know all the details, but it sure seems like it has taken a long time. One thing I do remember being discussed is Mt. Spokane's desire to go to Spokane County to lead the EIS process. State Parks was adamant about "trust us", we will get this done. Well, it seems like we can't trust you and we are starting over in a whole new process. What is different now?

It seems to me that all the environmental questions have been *asked and answered*. Now we seem to be repeating a lot of the process and this is very time consuming and again incurring cost that is way out of hand. This revenue would be much better spent on ongoing upgrading facilities and new ski runs to allow better accommodation of the ever increasing number of skiers, and skier visits to Mt. Spokane.

Comments: I have been reviewing the EIS scoping documents for Mt. Spokane PASEA Land Classification and have a couple of questions. Both relate to document "02 PASEA Land

Classification DS and Scoping Notice”.

1. On page 5, the third paragraph describes Conditional Uses allowed under Resource Recreation. It states:

*Examples of conditional use facilities in Resource Recreation Areas include horse-oriented camping, equestrian facilities, alpine ski facilities, equestrian trails, mountain biking trails, snowmobile trails and paved non-motorized trails. As proposed in Options 1 and 2, alpine ski facilities **would not be an allowed** conditional use in Resource Recreation Areas, only backcountry alpine skiing as an activity would be allowed.*

Can you explain why the conditional use of alpine ski facilities “would not be allowed”? I would like to understand the factors that dis-allow this conditional use for this area, and confirm that it is not allowed.

2. There are maps shown for Option 1 and Option 2. Why is there no map showing an option for classifying the PASEA as Natural Forest? On page 3, the third paragraph states, “the land classifications of Natural Forest Area, Resource Recreation, and Recreation are under consideration for classification of the Potential Alpine Ski Expansion Area (PASEA).” It further goes on to describe the no action alternative as classifying the area as Natural Forest. It seems to me there should be a no- action alternative or a third option map. I have seen this done on planning projects of for the US National Forest (IPNF in particular). Not having a map showing the option to classify the area as Natural Forest seems somewhat misleading. It seems to show the community that there are only two options.

It also seems rather strange that we have to use the term “no-action.” It seems some action needs to be taken to be taken to make a land classification for this area. A true no-action alternative would be leaving the area un-classified, as it has been for some time. I don’t think that is a very good idea and some classification needs to be made to properly manage the park.

Comments: Please do not allow further destruction of forest at Mount Spokane State Park. The wealthy do not need another set of ski runs. They can use the under used runs already in existence on the Spirit Lake side of the mountain.

Comments: Confronted with the stress brought on by our current predicament of economic upheaval, political polarization and rampant cynicism... many look to escape from this social turmoil by enjoying some aspect of local outdoor recreation. Whether hunting, boating, hiking, skiing or climbing, we seek sanctuary in the wonderment of nature that is found near and far across the Inland Northwest. Personally, I treasure my time spent on Mt. Spokane year round enjoying the trails either on foot, skis or pedaled wheels.

Although Mt. Spokane is a state park, Mount Spokane 2000 is a private, for-profit concessionaire who operates the ski area. Hiding behind the campaign of serving the public by expanding the ski area to better serve and attract a greater number of skiers and snowboarders, MS 2000 is no different than Exxon or Enron in chasing that ‘bottom line’. Seeking to move ahead lacking a Concessionaire Plan or complete and proper authorization from the Washington State Parks Commission, MS 2000 seeks to clear cut through old growth forest on the western slope of the mountain in order to create a few new runs and eventually the installation of a chair lift. The view of Mt Spokane looking eastward from Elk and Mead will be scarred forever!

In addition to the tragic loss of this old growth forest and devastating damage to the environment, it is a poor business decision! The expression “if we build it, they will come” won’t hold true here. Having 25 chair lifts, 314 ski runs and 8,790 ski-able acres within 90 miles of Spokane, expansion of this type isn’t the answer. What Mt. Spokane needs is a realistic business plan for its existing terrain and not

chainsaws and bulldozers for something unnecessary.

Comments: Please consider the irreplaceable value of the old growth forest on the west side of Mt. Spokane. The forest on this piece of land cleans our air, provides the headwaters for important streams in our area, and provides critical habitat for animals, not to mention the aesthetic value of its pristine beauty. To haze and cut swaths into this rare, unique and beautiful area seems a travesty and damages our health and balance with nature.

Many mountains and ski resorts already exist in this area for the pleasure of down hill skiers. The Mt. Spokane alpine ski area competes with some easily accessible, amazing mountain resorts that will have a competitive edge no matter how much of our forest is sacrificed to try to bolster it. I have skied Mt. Spokane and the nearby resorts and know the difference. The potential horrific irony in this matter is the destruction of the amazing Mt. Spokane old growth forest for ski runs that would draw no more significant numbers of people once the novelty wore off. Trying to find a balance in this matter, one group has promoted an alternate plan that expands and improves runs, lodges and infrastructure in the already existing Mt. Spokane ski area. This seems a much more prudent course of action than destroying an irreplaceable old growth forest and ecosystem.

In addition to the value of leaving the forest intact, please consider that many people use and enjoy this area already as is with minimal impact: hikers, people on snow shoes, back country skiers, birders, photographers, nature lovers and people who cherish the magnificent view of the unmolested mountain. How is the proposed use for down hill skiing a few short months of the year able to trump all the other valued and harmonious uses of the land and forest? I believe these other interests should be considered as well.

Please consider all these things as this process moves forward. I believe strongly that the west side of Mt. Spokane should be protected and the old growth forest saved for the good of the environment in this area and the enjoyment of all people, not just down hill skiers, for now and future generations. Having hiked in this area and enjoyed its pristine beauty, I find the thought of it being thoughtlessly deformed, if not destroyed, by commercial interests of questionable value quite maddening and saddening. Please help us save our forest!

Comments: I am writing to urge the WA Parks & Rec. Commission to have the Mount Spokane EIS consider the value of the largest stand of Old Growth in Spokane, and how its value cannot be mitigated or compensated for. Additionally, I would like the EIS to consider the concerns brought up by the County HEaring Examiner when he ruled against the timber harvest earlier this year, the WA Dep. of Fish & Wildlife and the DNR's WA Natural Heritage Program.

We have enough ski runs in the area, what we will lose in exchange for a few additional turns on the slopes is not worth it.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed. It would be a wonderful addition for all winter recreation enthusiasts, but particularly for the 600 + seniors who are Prime Timers. This is all about doing a great thing for people

Comments: Thank you for this opportunity to Comments on the scope of the EIS for Mount Spokane. The Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park is an incredibly important alpine ecosystem and rare in eastern Washington, so valuable, in fact, that State Parks in its wisdom prevented any consideration of Recreation or Resource Recreation at the time the park land was being classified and has treated this area as Natural Forest Area.

I strongly encourage the Parks Commission to designate the PASEA a Natural Forest Area to keep this alpine ecosystem intact to protect wildlife and their habitat; prevent damage to springs,

wetlands and sources of creeks; and safeguard the old- growth forest in this area.

The Mount Spokane Ski Area over the years has done irreparable harm to 64% of the upper mountain alpine zone. It is unconscionable that the Parks Commission and the state could allow an expansion of the ski area into the last remaining old-growth in Spokane County and a unique one at that. The present ski area would benefit far more by improving the facilities they have than ruining another area of the mountain. The ski area needs new septic systems; parking areas; chairlifts; stormwater retention; and repairs to the lodge facilities long before it needs more terrain. The benefits to the general public on keeping the PASEA a Natural Forest Area far outweigh a single user group's self promotion, a group that only uses the mountain for less than four months a year.

I believe the EIS must include the following to be complete:

- Evaluate the concerns of the Washington State Department of Fish & Wildlife and Department of Natural Resources. Potential loss of any species of wildlife or plant should lead to an immediate designation of NSA.
- Complete a study on the forest resources within the PASEA, the type of trees and their age. Documented old growth stands shall be left intact and critical area buffer zones shall be placed along wetlands, springs and creeks.
- Insist on a habitat management plan for sensitive species and for species that may be listed as endangered in the future, such as lynx, wolverine, grey wolf, pika, and goshawk, as well as rare and sensitive plant life. The pika, for instance, has been denied endangered species status, but may be listed in the future as alpine zones are affected by global warming.

The warming of the [American pika's](#) mountain habitat in California's Sierra Nevada and in parts of nine other Western states has shrunk the tiny mammal's population and could eliminate part of its range, but federal biologists say new studies suggest the pika will adjust to warmer homes or [migrate to cooler areas upslope](#).

The pika on Mount Spokane cannot migrate upslope, so any loss of their habitat to development will be fatal. The ski area intends to disrupt .5 acre on the summit where this mammal lives, as well as their habitat in the rock outcrops on the western slope.

- Evaluate the destruction of the land by logging, including debris left on the ground, burned or chipped, and the resulting weed infestations that accompany logging.
- Determine the impacts on Grylloblatta, a rare species found in the PASEA.
- Evaluate the impacts of land clearing and the resulting erosion into Blanchard Creek, wetlands, springs and creek sources.
- Evaluate the loss of wildlife corridors. The PASEA provides uninterrupted alpine wildlife habitat. That can't be replaced. Once it's logged and trailed, it changes the pattern of wildlife and the type of wildlife that will inhabit the area. There is no mitigation for fragmentation of intact wildlife and species habitat.
- Require a completed Master Concession Plan from MS2000 prior to any discussion of classification.
- Require a specific number and detailed plan of the lift towers and any permanent or temporary equipment roads needed to build facilities.
- Require the MS2000 to show the grade or level of skiing throughout the current ski area, such as beginner, intermediate and advanced ski slopes and acreage. Provide a map of these areas.
- Require MS2000 to document their claim of "better circulation and more even distribution of low-intermediate and intermediate level skiers throughout the ski area." What is the basis for their assumption this will take place?

- Require MS2000 to document how opening up the PASEA will “provide new tools to protect park resources.” How will this be accomplished? How will developing the PASEA “provide an appropriate variety of recreational activities to park visitors?” Lift served alpine skiing is at most a four month activity. Snowshoeing is already allowed in the Natural Forest Area zone, so will the runs be torn up by mountain bikers during the spring, summer and fall? What restrictions will be in place to protect the habitat, plant and wildlife once vertical strips of land are clear cut and fragmented?
- What is the 12 month impact to habitat, plants and wildlife of opening up this area to other forms of recreation, other than skiers? What is the long term impact over 20 to 40 years?
- Require MS2000 to show documentation, including scientifically accurate measurements from an accredited state or federal agency that the PASEA has “better long term snow accumulation”. This broad hyperbole has been a staple of MS2000’s campaign and yet, not one shred of proof has been seen. There needs to be a study with snow monitoring stations around the entire mountain at specific elevations. These need to be checked weekly for a ten year period. If the west and slightly northwest facing slopes do indeed have more snow, then MS2000 can claim scientific evidence proves their point. But the science will show that the same amount of snow that falls on the entire mountain is retained longer underneath the canopy of old trees found in the untouched PASEA. Once that canopy is destroyed, wind and solar energy will melt the snowpack just as fast as that on the southeast side.
- Require a “climate change” study to determine whether Mount Spokane will survive the accelerated warming of the earth’s surface. An article in Men’s Journal, “The Future of Snow”, by Kitt Doucette (Dec 2010) predicts dire circumstances for even the best and highest ski areas, let alone one like Mount Spokane that is so low in elevation. Below are three quotes from the article with ski industry statistics. Climate change is going to close Mount

Spokane is 10 to 20 years and state parks will have authorized the destruction of the only area left on the mountain capable of holding snowpack:

According to a recent study commissioned by the city of Aspen, Colorado, if greenhouse-gas emissions continue at the current rate, by 2030 the ski season in many resorts across the continent and in Europe will have shrunk by 10 days or more. After that, things only get worse: The report paints a disquieting picture of snow falling later and melting earlier, with higher temperatures prohibiting even snowmaking. By 2050, any resort in the world below 5,000 feet in elevation will not have a natural snow season, and by 2100 – and maybe sooner – the only winter precipitation at what are now our resort areas will be in the form of rain.

But if global warming is the biggest issue facing his business, it isn't the only one. The overall economy of skiing is shrinking at an alarming rate. Michael Berry, president of the [National Ski Areas Association](#) (NSAA), outlined the industry's current state to resort owners at a recent conference. The data is grim: Annual skier days in the U.S. have been stagnant at around 50-60 million for the past decade; 83 percent of people who ski for the first time never try it again; and trend forecasting indicates that skier visits – 57.4 million in the 2008-09 season – will decline to 41.4 million by 2020 or 2021. "We need to talk strategically about how we bring people to the sport – how we grow it," Berry said.

According to the NSAA, of the 735 resorts in existence during the 1982-1983 ski season, only 471 remain today. Most of the absentees are the kind of mom-and-pop hills that defined the early

ski experiences of the baby boomers who now make up the industry's only stalwart supporters – small operations with tiny lodges resembling locker rooms, where skiers brown-bagged lunches at cafeteria-style tables.

- MS2000 continues to claim the PASEA is north facing and “northerly-facing. They are directionally challenged and their own Chair 4, which runs directly north, places a big hole in their argument that the resort needs more north facing slopes. The proposed Chair 6 runs almost due west and ski runs 1, 2, and 3 face west and slightly northwest. Run 4 runs directly northwest. Even with Chair 4 running directly north, the resort does not open any earlier and still closes early, even when there’s good depth to the snow. Closure depends on quantity of skiers, not snowpack. Look at MS2000’s opening and closing dates and compare those to the snowpack and number of daily skiers.
- Require all historical wind speed and direction records from the top of the mountain to be charted and put into the record. MS2000 claims “As a general rule (this is not science-based fact) the higher elevation, the more northerly facing, and the more wind protected areas will have consistently better snow retention and quality. As a result of these factors, the snow quality in the PASEA area is generally some of the best found at Mount Spokane.” This statement, of course, is more hyperbole. The wind comes from the southwest and the original lodge and rope tow on the west side was abandoned because of the wind on this side of the mountain. If MS2000 claims this is true then they need to do the research from the records kept by the weather service.
- Require all emergency response records to be submitted where the Mount Spokane Ski Patrol, a National Ski Patrol unit, has responded to lost or injured skiers in the PASEA. MS2000 claims it “has provided emergency response to lost and injured skiers within the PASEA on almost a weekly basis, which taxes the resources of its all-volunteer ski patrol.” Not one shred of evidence or record backs this claim. In fact, any time there is a missing skier or skiers in the PASEA, the news media follows it closely and the entire community knows. It happens once, maybe twice a season. This claim needs to be vetted and can easily be done. The National Ski Patrol requires records to be kept by all affiliates and these records should have names, places, dates, responders, times, treatments and summaries.

To end, this is all about one user group that is only using the mountain between 90 and 100 days a year. Mount Spokane is a state park, not a private ski area. The PASEA is a rare non-fragmented ecosystem in a unique alpine zone. To allow clear-cutting of huge swaths of acreage in the PASEA for a sport that is declining in use and is viable for only 3 to 4 months a year would be a failure of our present leadership to understand the importance of this area to wildlife and to the future of the park. Once it’s developed and the area is opened up to weeds, run-off, and abuse, the area is gone for good. Mount Spokane is at least 66% trashed by trails, clear-cuts, erosion and weeds. Let’s not let it happen on the remaining one-third. All someone has to do is walk down trail 135 off the summit to see the horrible mess mountain bikers have done to the surrounding environment to know what this area will look like after logging, construction and more user groups. The parks commission was looking for excuses to change the classification to Recreation and MS2000 threw every bit of pooh on the wall to see what would stick – “better snow”, “no wind”, “open early”, “more money to parks”, “better emergency response” – I’ve watched this circus now for years. Make MS2000 prove their claims. When they threw “better emergency response” at the wall, the commission pounced on it like it was true! They didn’t even ask to see the records and proof. I almost heard a collective sigh of relief from the commission members when they suddenly found something as credible as public safety to make their fatal decision to classify the PASEA as Recreation.

All I ask is that the EIS be based on science, numbers, and records, not hearsay and probability.

Comments: Thank you for the opportunity to Comments on the scoping of the EIS for the Potential Alpine Ski Expansion Area (PASEA) on Mount Spokane State Park. This letter is on behalf of Spokane Audubon and its 160 members. The mission of Spokane Audubon is “to nurture and protect birds and other wildlife and their habitats, and to encourage biological diversity for the benefit of people and nature in the Spokane region and the world in which we live.”

Spokane Audubon is especially concerned with the ecological impacts that would result from the ski area expansion. We recommend that north slopes of Mt. Spokane and Blanchard Creek areas be designated a Natural Forest Area. When conducting the EIS please consider the following:

1. Mt. Spokane is only one of two areas in Spokane County over 4250 feet in elevation and contains the largest expanse of old growth habitat in Spokane County. Ski area expansion would significantly fragment this habitat type.

With regards to the PASEA, the Washington Department of Fish and Wildlife stated:

“The native old growth forest habitat on the northern aspect of Mount Spokane is an extremely unique forest ecosystem for the region with a high value for wildlife and species diversity. The northern aspect is the very feature that makes this forest type unique from all other forest areas within Mount Spokane State Park. Considering its size, its unfragmented condition, along with its stage of forest succession structure and complexity, a similar forest cannot be found anywhere else in the Spokane County regional area, nor replicated.”

Please include in your analysis the biological opinion of the WDFW and conduct a thorough and up-to-date biological survey of the area in consultation with the WDFW and US Fish and Wildlife Service

2. A number of wildlife species depend upon this habitat type remaining in a primitive unfragmented condition. Please analyze how the PASEA would affect the following sensitive species which are known to occur in this area:

Lynx, Wolverine, Pine Marten, Pika, Northern Goshawk, Dusky Grouse, American Three-toed Woodpecker, Black-backed Woodpecker, Pileated Woodpecker, Clark's Nutcracker Pine Grosbeak, Hermit Thrush, and Fox Sparrow.

3. Please consider the cumulative impacts that would result from ski area expansion. The scope of the analysis needs to consider that as this area is the largest unbroken old growth habitat for many miles, it is relatively isolated. Therefore, many species could potentially lose core habitat, migration corridors, and become more exposed to hazards as a result of habitat loss.

4. Please consider the impact the project will have on other recreational activities such as backcountry skiing, cross-country skiing and snowshoeing. Currently the PASEA provides exceptional access for low-impact recreation. Ski area expansion would curtail, if not eliminate this area for these activities.

5. Please consider the impacts to the viewshed. The PASEA would significantly alter the natural quality and landscape that is seen from the west.

For the above reasons, Spokane Audubon has serious concerns about the PASEA and supports a Natural Forest designation of the Blanchard Creek area, as recommended by the Washington Dept. of Natural Resources.

Sincerely, Greg Gordon
Conservation Chair
Spokane Audubon

Comments: Whenever I go up to Mt Spokane, whether it is skiing or snowshoeing in the winter or hiking in the summer, I have to pinch myself that we have such a wonderful resource as Mt Spokane, right in our back yard! I am writing to express my support for a full and complete Environmental Impact Study before any expansion is made to the ski area, and to push for consideration for primitive recreation, for endangered species and for any other environmental impact to waterways/fisheries, etc. Alternatives to the Proposal to Expand the Ski Area should be addressed in the EIS too, in a Master Concession Plan.

Comments: I am writing in opposition to the expansion on Mt. Spokane. I've read the arguments for both sides. In addition I have spent countless hours on Mt. Spokane as a snowboarder. The plans for improvement seem reasonable and relatively low impact. However, I have hiked in this area and feel the majesty of it is too great to develop. In addition, the increasing number of back country and snow shoe enthusiasts should be considered. This is a perfect spot for them.

Comments: I WANT THE WEST SIDE OF MT. SPOKANE PERMANENTLY PROTECTED AS A NATURAL FOREST AREA. I walk the old growth trail you wish to destroy; as a child with my mom & dad and now I take my 4 children to walk among the pine. There is no other place like it. Please do not allow the development.

Comments: I am writing in response to your request for Commentss regarding Mt. Spokane Ski & Snowboard Park's application to install a chairlift and seven runs within that portion of land described in the Concession Agreement as PASEA. Please include this letter in the record.

I am a long time season pass-holder on Mt. Spokane, having started skiing there in 1957 and making it my home mountain ever since. I am active in the ski community, volunteering for Spokane Ski Racing Association, the youth ski racing team based on Mt. Spokane, and volunteering for service on the MS2000 Board. I spend many hours each year on the mountain skiing and working on ski races and other similar activities. I know the mountain and its needs very well.

I request that the land in the PASEA above the Chair 4 Road be classified as Recreation and that any decision by Washington State Parks & Recreation Commission regarding PASEA classification grant permission to Mt. Spokane for the installation of the proposed chairlift and the seven runs. Below are a few of the many reasons why I make this request.

First, as to land classification, I believe that the appropriate course of action here is for the Commission to classify the PASEA acreage as Recreation, so as to match the classification for the rest of the resort and to make for consistent management of the entire concession area. That would make the operation and management of all chairlifts and all runs within the concession area the same. Such a classification would, as well, make for the best and most consistent recreational experience for the skiing and snowboarding public. That is, after all, the group who will benefit from such an action, who has waited for so long for this process to conclude, and who has overwhelmingly served notice to the Commission that the chairlift and seven run proposal should move forward.

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To classify the 279 acres where the chairlift and seven runs are proposed as NFA would go against the wishes of those who donated the land to the State, would not meet the needs of the vast majority of the skiing and snowboarding public, would not be in keeping with the recreational aspect of State Parks' mission, and would not meet the terms of the contract between State Parks and

MS2000. Additionally, classifying the land outside of the 279 acres as NFA would be in direct contradiction to activities (e.g., backcountry skiing, horseback riding, mountain biking, snowmobiling) which already occur in the PASEA and have for decades. In effect, those historic recreational uses would not be allowed to continue, essentially gating the recreating public out of these lands. Such action, I believe, would be contrary to State Parks' mission

To quote the State Parks Volunteer Host Guide regarding State Parks' Mission: "The Commission fosters outdoor recreation and education statewide to provide enjoyment and enrichment for all, and a valued legacy to future generations." State Parks' Facebook site states that State Parks' Mission is to "connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives." Recreation is what this proposal is all about; recreation that would be available to all Washingtonians, not just a few.

Further as to classification, let me remind you that the 1999 CAMP process, against the majority of public input, already restrictively classified over 1/3 of Mt. Spokane State Park's approximately 14,000 acre land inventory for the purpose of protecting natural plant and animal communities. In the subject application here, it looks like the vast amount of acreage below the Chair 4 Road will add even more acreage to Mount Spokane State Park's large inventory of NFA protected lands. When is enough, enough? When do the people who utilize the mountain get some rights? When will humans become as important, or even more, as flowers and trees and wild game? Now is that time, I say.

Classify the PASEA area above the Chair 4 road as Recreation and allow continued and expanded use of that land for alpine skiing and snowboarding in the only location where it is possible to provide the much needed expansion of usable terrain.

Let me add further that there is no need for more public meetings or hearings or testimony on this proposal or on alternatives; we have already had more than enough of those¹. There were at least fifteen State Parks facilitated public meetings in Spokane, Olympia, Castle Rock, Yakima, Quincy and other locations which encompassed many hours of public testimony plus there were at least sixteen mountain specific public planning meetings leading up to the May, 2011 Commission decision regarding classification of these lands. There was public Comments on the

¹ See attachment #1 which lists many of the times in which public testimony has already been provided in this process.

Crick; Page - 3

prior EIS. And there has been even more public testimony subsequent to the most recent court decision. The process has already talked the options and possibilities and alternatives to death.

Remember that the numerous State Parks' plan options presented by the Daniel Farber group in the 2006-2007 timeframe produced way more alternatives than MS2000 ever wanted or would have constructed. There simply are no other options to consider than those which that group brought forth. The Optimized Experiences options that Mr. Farber presented as potentials for State Parks.

to consider included several multi-million dollar construction projects within the PASEA in addition to multiple chairlift and run options. Ultimately that group's far reaching options were, via a thorough vetting process, reduced down to what is currently before the Commission in this proposal. There is nothing else to discuss. The public and State Parks' sister agencies have testified or been provided the opportunity to testify on all of the options, including especially the one proposed here now.

All the information that could ever be provided has been provided. All of the opponents' objections are known. All alternatives have been studied. All the science and environmental conclusions have been presented. Nothing that the opponents have presented has refuted the science shown by the contracted studies performed by experts and there is just no more science out there for them to present. Simply, any impacts can be mitigated. Such is allowed by law. If anything, the further environmental field work that MS2000 commissioned following the 2011

Commission decision only reinforces its consultants' and State Parks' previous conclusions presented in the 2012 Mount Spokane Ski and Snowboard Park Final Supplemental Environmental Impact Statement. That is one reason, I suppose, why the opponents have lately changed their tactics to one of personal attack. But regardless of the methods employed by the opponents to stall and delay this process, there is no need for more meetings, hearings, or testimony. Let's get on with it.

Simply, State Parks does not need any other or additional input in order to fulfill its statutory obligations. The court did not order any meetings and the WAC does not require any meetings. The court simply said that State Parks got the EIS out of order in the process. I say just get on with the process. Enough is enough. Change the order of the process to meet what the court ruled and get this process moving again; without more. State Parks has already been too slow and made too many mistakes in the process. I say just correct the mistakes and get this process moving again so the skiing and snowboarding public can enjoy the PASEA terrain.

Regarding recreation, without a doubt, Mt. Spokane is predominantly a winter recreation park. It is utilized for winter recreation activities by thousands of Washington residents each year; most during the winter months. Providing that type of winter recreation is just what MS2000 has the right and obligation to do under the Concession Agreement with State Parks. Such recreation is a major part of State Parks' mission. The PASEA is the only available terrain for the expansion of Alpine Skiing and Snowboarding in order for Mt. Spokane and State Parks to meet the public's demand for growth and it should not even be considered as NFA but only as Recreation.

Skiing and snowboarding are important recreation activities to the citizens of Spokane and the surrounding community. Many residents live in this region in large part because of the winter recreation opportunities. These recreation activities are offered by Mt. Spokane at an affordable pricing structure. More so than the other neighboring resorts; all of which charge more for their lift tickets plus all of which are further travel distances from Spokane.

I have to believe that serving the many at reasonable pricing meets with State Parks' mission. I have to further believe that recreating close to home and minimizing driving times and distances also meets with State Parks' mission. It all should. And for sure having a chairlift and groomed runs also serves the many in their quest for recreation. The many should matter to State Parks.

While I admire the few who climb to the top instead of riding a chairlift and who have the ability to ski and board down un-groomed runs, I believe that serving only those few individuals and providing them their own private playground is not within State Parks' mission.

Simply, most of the public needs to ride uphill on a chairlift and most need slope grooming for the downhill portion of the round trip as they learn and practice and expand and enjoy their skiing and boarding skills. The very few who pursue backcountry skiing and boarding as hikers are a small portion of the overall skier community and virtually none of the snowboarding community. This land upon which the masses want to expand should not be reserved for just those few elite athletes who look at chairlift riders with disdain.

The area of this proposal would be much better utilized for teaching the much larger group of youth and beginner skiers and snowboarders as well as to provide an opportunity for all higher skill level users to improve their technique. There still will be hundreds of acres of backcountry terrain for those elite hikers to use. The groomed runs of this proposal only touch a small amount of the 14,000 acres of the Park, less than 1% actually. I ask the Commission to serve the many, not the few, as I believe that to be State Parks' mission.

It is quite evident that many of the opponents of this application have not been to Mt. Spokane for a long time, if ever. The Commissioners witnessed that in their most recent meeting. The opponents seem totally uninformed as to how Mt. Spokane is operated under the MS2000 concession contract, its non-profit mission, its dramatic forward progress over the years, and its investment of millions of dollars into facility improvements. They also seem unaware of the fact that Mt. Spokane has been consistently voted in independent polls to be one of the best resorts in the region; such voting by the masses.

The truth is that many of the opponents of this project simply do not state the truth. The opposition seems to be in many ways fueled by a personal vendetta of animosity of a few individuals. It is not based on the truth. Catering to that vindictiveness is not within State Parks' mission. Finding and acting on the truth is.

The truth is that Mt. Spokane has invested millions of dollars back into the concession in the form of lodge, chairlift, trail, and facility improvements and enhancements. More than \$6,500,000 by General Manager Brad McQuarrie's account². Understand too, that amount is over and above normal routine every day maintenance. Such is the basic concept of the non-profit status; all profits are reinvested in the facility instead of being paid out to corporate executives and stockholders. The opponents' accusations that Mt. Spokane has not improved and reinvested is simply not the truth.

The truth is that the number of visitors to the facility has increased several-fold since MS2000 took over the concession from the prior failed operator. That was the basis for awarding to MS2000 and that truth is proven by the public's return to the facility in droves such that a need for more usable terrain even exists and further by their positive votes in the media surveys. The opponents' accusations to the contrary are simply not the truth.

The truth is that the groomed runs are groomed with the best of them and that the run-down lodges which Mt. Spokane inherited from the prior failed operator have been improved upon dramatically. If the opponents would ever actually visit the resort they could see the truth.

The Commissioners have witnessed the truth first hand. Let the truth be the basis for this Commission decision. The truth is that MS2000 has been a good partner to State Parks and has managed the concession extraordinarily well. The truth is that this proposal for a chairlift and seven runs is the best alternative. The truth is that the concession agreement between Mt. Spokane and State Parks contemplated this expansion from the beginning. The truth is that many of the opponents oppose the project for individual and selfish reasons, not because of any overriding public policy concern or a better alternative or failure by Mt Spokane.

And speaking of funding and investment truth, State Parks has to consider how it funds its own operations. State Parks' financing has been shifted by the Legislature away from the relative certainty of mostly General Fund support to a budget in which the majority of operating funds has to be earned by State Parks. That is, the legislature has determined that State Parks must transform itself to a self-sufficient agency. Thus, State Parks is now in an era when State Parks must be creative in revenue generation and receptive to alternates and expansion.

State Parks' own recent report recognizes that truth. See "Washington State Parks and Recreation Commission, Efforts to Increase Revenue, Status Update on the Fiscal Health of the State Park System, Report to the Office of Financial Management and Legislature as required by ESSB5034 (2013 2nd Special Legislative Session); <http://vwww.cpr4parks.com/october2013report.pdf>.

² See attachment #2 for a copy of General Manager Brad McQuarrie's May 22, 2013 letter to State Parks which lists and describes many of the improvements MS2000 has made since being awarded the Concession by State Parks.

State Parks no longer receives automatic annual amounts from the state each year and, as recognized in the report, State Parks is not likely to return to a system of funding from the General Fund for future operating needs. So State Parks simply must look at how this proposal will affect its own funding in the future. State Parks has repeatedly expressed a desire to build new partnerships with concessionaires in an effort to make State Parks more sustainable. That concept becomes more important with each passing day. State Parks' own report recognizes that partnering with private entities is one of the preferred methods of meeting future State Parks' funding goals. In the Mt. Spokane Concessionaire, State Parks has its most valuable partner already. That is the funding truth. Mt. Spokane pays more in concession rent than any other Concessionaire; by far. Such payments will only increase with approval of this proposal and construction of the proposed lift and seven runs.

Mt. Spokane has long ago submitted financial data showing how the proposal will increase revenue to State Parks. State Parks reviewed and approved those financials and they are a part of this process. Yet the treatment of Mt. Spokane has been in many ways more of animus rather than one of good faith partnership and working to improve State Parks' funding position. Here is the largest revenue generating Concessionaire, a non-profit, that is making significant capital improvements to State Parks property, with a goal of exceeding the Public's needs, seeking to pay more revenue to State Parks and yet, the proposal MS2000 submitted to State Parks in 2004, is yet to be approved and is still being debated and subject to delay for no good reason. What does this treatment say to other, would be, private partners? To improve its own funding status, as well as for the winter recreation needs of the skiing and boarding public, State Parks should move this application forward in a spirit of cooperation and with dispatch. Only then will State Parks realize the additional funding that will flow to State Parks.

For all the reasons stated herein, plus all the many more stated by others, I request that the land in the PASEA above the Chair 4 Road be classified as Recreation and that any decision by Washington State Parks & Recreation Commission regarding PASEA classification grant permission to Mt. Spokane for the installation of the proposed chairlift and the seven runs.



May 22nd, 2013

Washington State Parks and Recreation Commission
1111 Israel Road S.W.
Olympia, WA 98504-2650

Dear Washington State Parks Commissioners,

There have been questions raised in the past public Comments period regarding why MS2000 is concentrating efforts on "backside" expansion rather than taking care of "frontside" improvements. The simple answer is, we haven't. MS2000 has a long track record of capital improvements dating back to when they first signed the Concession Agreement, and continuing today. In recent history, we have been engaged in a Master Planning effort with State Parks, which has limited trail and ski run improvements until completion of the SEPA process, but improvements to other facilities have continued moving forward. Here is a brief history:

First, it is important to note that MS2000 was formed in October 1990, as a community based advisory group to State Parks. The current Concessionaire at that time, Mt. Spokane Ski Corp (MSSC) was not operating the ski area in way that the Community supported. MS2000 had no desire to operate the Concession Area, but merely wanted to help State Parks establish minimum service requirements for the Concessionaire before a new 20 year Concession Agreement was formed. In December 1990 MS2000 presented its Observations and Recommendations to the Commission. In response, State Parks commissioned its own independent \$60,000 study, by SnoEngineering (now SE Group). The SnoEngineering study, conducted in 1992, confirmed in detail MS2000's observations.

In 1994, State Parks issued a Request for Proposal from parties interested in operating the Concession area for a 20 year term. Only one proposal was submitted, which was that of MSSC. State Parks entered into Concession negotiations with MSSC. Out of concern that with no competition, there would be no significant service improvements for the next 20 years, and at the encouragement of State Park staff, MS2000 submitted a \$10,000 performance guarantee and a request to be included in the negotiations. The essence of the MS2000 proposal was:

- Operate the concession by a community controlled, non-profit entity;
- Invest all operating revenues in excess of expenses back into the alpine ski area facility;
- At the end of the concession term, return the concession Possessory Interest to State Parks at no charge.

MSSC was not willing to match MS2000's proposal. In July 1996, the Commission awarded the next 20 year Mt. Spokane State Park alpine skiing concession to MS2000.

Initial financing was difficult. Being in a State Park and having no possessory interest, MS2000 had difficulty securing favorable terms. Community supporters ended up becoming guarantors as loan documents were drawn up. Taking over the Concession area in October, right before the ski season, compounded the financial difficulties even further. Regardless, MS2000 wanted to act fast in making the necessary improvements to service levels. In addition to the initial mortgage, MS2000 also borrowed capital in increments from \$5,000 to \$300,000 from 21 separate people or organizations in the community. All was invested back into the concession area in the first few years. The targeted improvements were those initially suggested by MS2000 Study Group and confirmed by the SnoEngineering study, and part of MS2000's overall, long term plans for improvements.

Improvements 1997-2001:

- Acquired three new state of the art grooming machines to provide better quality snow grooming \$540,000
- Improved Food and Beverage services and opened Lodge 1 for food and beverage
- Opened Chair 4 five days a week. Previous concessionaire would only open C4 on weekends and holidays
- Painted lodges and upgraded furniture and completed many deferred maintenance projects on the buildings \$300,000
- Added a deck onto Lodge 1 \$15,000
- Improved the quality of customer service with uniformed and friendly lift attendants, improved signing and new brochures \$180,000
- Purchased over 400 pairs of modern "shaped" rental skis \$120,000
- Purchased 300 new rental snowboards \$90,000
- Hired and trained over 100 ski and snowboard instructors

The first four years were concentrated on improving Guest Service which we continue to improve on today, but after those first four years, the long term plan focus moved to improving the ski experience and the safety and reliability of lifts and facilities. Please keep in mind that this list represents what is over and above normal maintenance. As soon as the ski area shuts down in the spring, we begin tearing everything down, inspecting, and rebuilding. This includes all the lifts, grooming equipment, vehicles, and the facilities. We have everything back together in the fall before we hire and train our seasonal employees for the next season. Most years, we spend close to a million dollars on maintenance, repairs and upgrades between closing and reopening.

2001-2002

- Rebuild of main drive motors on Chairs 1, 2 and 5. \$62,000
- Galvanized Chairs (instead of paint) 1 and 3 \$27,000
- Purchased a commercial vegetation management mower \$67,000
- Replace Chair 1 Haul Rope \$58,000
- Lodge 1 Food and Beverage remodel \$17,000

- Furnished and opened the Vista House for food and beverage services \$7,000
- Installed new Fuelstorage and vehicle fueling station in accordance with SEPA \$23,000
- Hired prison crews to do extensive vegetation management \$30,000
- Night lighting improvements \$16,000
- Chair 1 Lift Operators buildings \$12,000
- Purchased a new snow groomer \$175,000

2002-2003

- Rebuild drive motors on Chairs 3 and 4 \$37,000
- Replace Chair 5 Haul Rope \$35,000
- Galvanize Chairs 2 and 5 \$22,000
- Scrape and paint towers and machinery on Chairs 2,3 and 5 \$40,000
- Widened and improved "HourGlass" \$15,000
- Extensive vegetation management using prison crew contracts \$32,000
- Replace Rental Gear \$212,000
- New Ski Instructors Uniform Jackets \$20,750
- New Light Poles and lights on Swede's Folly \$27,000

2003-2004

- Scraped and painted towers and machinery on Chair 1 \$18,000
- Widened and improved "No Alibi", "Gate's Park" and "Lower Nastar" \$26,000
- Purchased a commercial garbage dump truck \$24,000
- Moved Terrain Park and associated facilities from "Northwest Passage" to "Half Hitch" \$20,000
- Purchased new grooming machine \$182,000

At this point, State Parks asked for a Master Plan. State Parks Director Rex Derr held a meeting with MS2000 in October of 2003. He was impressed with the amount of improvements and success that MS2000 had so far, but with the number of projects we were submitting for approval each year, State Park Staff wanted to see the big picture. A Master Plan was needed before any more projects could be submitted. In December 2003, MS2000 submitted a Master Development Plan, which specifically excluded the PASEA at that time. Staff and AG asked us to not include the PASEA, so the MOP could be approved faster. In 1999 the Commission said they would classify the PASEA upon completion of the Ski Area Master Plan, or the completion of the Mt. Spokane State Park Comprehensive Trail Plan (more on that in 2006).

2004-2005 {29 Day Season due to lack of snow}

- Worked with Park Staff to define the MDP approval process. No new Trail project approvals.
- Installed a new heating system and removed the underground heating oil tanks at Lodge 1 \$18,000
- Dynamic Load testing of Chairs 1 and 5 \$12,000 (new testing requirement)

- Installed a water well and associated infrastructure to the water system at Lodge 2 \$32,000

2005-2006

- Worked with State Parks to define the MOP approval process. Staff allowed some trail improvements to be submitted for approval.
- Added Gladded Skiing in the Chair 4 pod, and run improvements to "Allison's Way", "Rockslide", "Crash and Burn", "Skid Road" and "Trail to Chair 1" \$62,000
- Night lighting improvements to the Chair 2 Line \$20,000
- Rebuilt the Bottom of Chair 1 Counterweight Building \$22,000
- Dynamic Load testing of Chairs 2,3 and 4. \$18,000
- Rebuilt water system at Lodge 1 and connected to the new well \$28,000
- Replaced much of the Rental fleet \$78,000
- Built a new Ski Patrol Building at the top of Chair 2 \$15,000
- Potential Expansion Area Concept for Development Study \$38,000

At this point in time, the Mt. Spokane State Park Advisory Committee was working on completing the Comprehensive Trail Plan for the State Park. In the trail plan was multiple proposed trails in the PASEA, thus triggering Land Classification as per the 1999 Commission decision. MS2000 engaged the State Park's consultant, SnoEngineering, to do an in-depth study the PASEA and to build a conceptual proposal for development. The MDP, which was still not approved, now included the PASEA

2006-2007

- Worked with Park Staff to define the MDP approval process. "No new Trail project approvals until MOP approval."
- As per State Park process, consultants were hired to: Development of Master Planning Alternatives Documents, Scan of Environmental Issues, Study on the effects of development on other Recreation, a Regional Recreational Demand Study, Financial Analysis of Alternatives \$125,000
- Cleared and built a Tubing Hill at Lodge 1 \$12,000
- Carpeting and upgrades to Lodge 2 F&B \$44,000
- Purchased two newer enclosed shuttle buses \$28,000
- Excavated the Lodge 2 foundation, repaired and sealed up and backfilled \$25,000
- Installed a top of the mountain live webcam and free wireless internet into both lodges and the ski patrol building \$16,000
- Purchased and Installed a Point of Sale ticketing and accounting system \$128,000
- Purchased a "WinchCat" groomer, allowing more efficient and environmentally friendly grooming. \$315,000

2007-2008

- MOP approval process(facilities and infrastructure study) \$300,000 CTED Grant and \$78,000 from MS2000
- Replace the Chair 3 Haul Rope \$72,000
- Remodel to Foggy Bottom lounge and 12 F&B \$32,000
- New staff uniforms for some departments \$16,000
- New operating schedule...Open 7 Days a Week!

2008-2009

- MOP approval process (aerial mapping, run surveys, etc) \$78,000
- New Lodge process (lobbying, additional studies, etc) \$42,000
- Moved Tubing Hill to lodge 2, and installed a new surface lift \$52,000
- Rebuilt the Top of Chair 2 unload, building and electrical \$48,000
- Installed night lighting on Allison's Way \$30,000
- Installed 2 "pick points" for the winch cat operation \$21,000
- Purchased a new snow groomer \$275,000
- Completed the lodge 2 F&B remodel \$38,000
- Open 7 days a week.

2009-2010

- PASEA approval process (PBI study, SE Group, etc) \$124,000
- Chair 4 Haul Rope replacement \$78,000
- Chair 2 Bullwheel Bearing replacement \$22,000
- Rental Shop Remodel \$16,000
- Lodge and Facilities upgrades \$33,000

2010-2011

- PASEA approval process (SEIS, permitting) \$157,000
- New Point of Sale System with scanners at lifts \$130,000
- Ran underground Fiber Optics to all buildings/lifts \$71,000
- 50% Rental fleet replacement \$190,000
- Lift upgrades \$170,000
- Lodge 2 upgrades (tiled kitchen, rubber flooring SnowSports, etc.) \$62,000
- Lodge 1 remodeled bathrooms \$16,500
- Built a completely new Daycare/Snowplay Facility \$82,000

2011-2012

- PASEA approval process (cont.) budgeted \$120,000
- Expansion Area Trail Clearing budgeted \$70,000
- 1800 Square Foot Main lodge addition and remodel \$328,000
- Various other lift and lodge upgrades

2012-2013

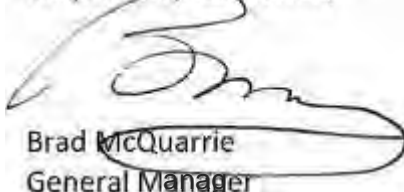
- PASEA approval process, field studies for wetlands, wildlife habitat, etc. \$140,000
- Purchased, dismantled and transported the Alpine Chairlift. This historic lift was purchased from Bridger Bowl Ski Area in Bozeman, MT. Mt. Spokane staff worked and lived in Bozeman for most of the summer dismantling and shipping the lift back to Spokane \$128,000
- Built a 100' long x 10' high retaining wall for a new wedding area adjacent to new lodge addition \$32,000
- Demo existing bathrooms and rebuilt at 3 times the size to accommodate ADA visitors and increased capacity \$120,000
- Enclosed staircases and entry doors. Stairwells are finished with all new wall coverings, concrete stair treads, and heated \$28,000
- New ticket area roof and siding. \$42,000
- Septic evaluation and testing in compliance with DOH \$21,000
- All new phone systems throughout the facilities, replacing the old analog phones with Voice over protocol. \$31,000

In conclusion, MS2000, in trying to do what was right for the community and State Parks, inherited a concession area with a significant amount of deferred maintenance. With no initial capital, a group of passionate volunteers turned the concession around. Mt. Spokane is now a true community asset and is consistently voted the #1 Favorite Place to Ski and Snowboard in the Annual "Best of the Inland NW" poll. All of the above capital improvements as well as all the sweat equity will be given back to the State at the end of the Concession Agreement.

You have heard, and will probably hear testimony again from the opposition that we have done virtually nothing to improve the ski area and that we should have used all the Master Planning money to make improvements. That is simply not true. We have made significant improvements throughout the 15 year partnership with State Parks.

We look forward to the future, when we can get the planning/permitting process completed, and devote 100% of our energy and resources to making Mt. Spokane safe, enjoyable and accessible to all.

Respectfully Submitted,



Brad McQuarrie
General Manager

Mt. Spokane Ski and Snowboard Park
29500 N. Mt. Spokane Park Drive
Mead, WA 99021

Attachment #1

Partial History of Public Testimony

Mt. Spokane was the twelfth park in the WSP system to reach the Commission for action in the Classification and Management Plan (CAMP) Project. It is the first park in the Project that worked with a Director-appointed park advisory committee. The CAMP staff planning and the Mt. Spokane Advisory Committee (AC) served as equal partners in making recommendations to the Director. Efforts were made to reach AC/staff planning team consensus on all recommendations to the Director. It was also agreed that the chairman of the AC (Cris Currie) would attend all staff planning team deliberations and staff would do likewise in AC deliberations.

On *November 12, 1998*, an issues identification public meeting was held in Spokane. Over 100 people attended. The AC and staff compiled the list of issues, added some of their own, and developed four alternative approaches to respond to the issues.

A public meeting to review and Comments on those four alternative approaches was held in Spokane on *August 24, 1999*, at which over 170 people attended and provided Commentss on their preferred park management direction for each issue.

On *October 6, 1999*, a third public meeting was held in Spokane to review preliminary staff and AC recommendations for the park. Over 130 people attended. Revisions to the preliminary staff recommendations based on public testimony and continued agency review have been incorporated into the staff recommendations found in this report.

On *October 15, 1999* a staff recommendation was brought to the Commission to classify the all of the Park except for the PASEA. Public testimony was taken.

2004-2006 – The Mt. Spokane Comprehensive Trail Plan Draft was collaboratively built. *16 public meetings over those two years*; MS2000, Park Users and environmental groups were all represented. Fleshed out and built the Comprehensive Trail plan which included the PASEA...dozens of alternatives developed, looked at, reviewed, discussed, with a final consensus as to a Trail Plan to recommend to the Commission.

June 22 2006 - CenterPlace, Spokane Valley – Commissioners General Meeting

- Mt. Spokane Advisory Committee president Cris Currie presented the Comprehensive Trail Plan and again recommended that the Commissioners classify the PASEA based on the Advisory Committee's recommendations
- Jim Meyer spoke on the history of the Ski Area since Mt. Spokane 2000 took over and of the need for facilitating increasing demand
- Brad McQuarrie spoke on the lack of response in the Master Plan process and the concern of moving forward any farther in the PASEA process without, at least, classification as a measure of possible success.
- Many Public Commentss

October 4th 2006 – Public Comments meeting – Mt. Spokane High School-meeting was held by Daniel Farber to solicit public Comments on the proposed Mt. Spokane Comprehensive Trail Plan and to help develop a range of alternatives for the Master Facilities Plan.

November 30th 2006 – Public Comments meeting – Mt. Spokane High School-purpose:

1. A description of the objectives and process of the then ongoing planning effort for the park.
2. A list of all public Commentss received to date
3. Responses to Commentss as appropriate
4. Alternative master plan approaches that addressed the issues which had been raised so far in the planning process
5. Analysis of the pros and cons of the different master plan approaches

January 4th 2007 – Public Comments meeting – Mt. Spokane High School Purpose was to present the economic and environmental data on the range of alternatives to the public and solicit their Commentss.

March 8th 2007 – Commission Meeting – Castle Rock, WA Staff was still unable to come up with a recommendation to Commission. Staff presented the economic and environmental data that Mt. Spokane had prepared to the Commission. Staff was looking for direction from Commissioners on which way to go. Commissioners requested some more information about why the land was donated to the park, the land's history, etc. Presentations by MS2000 and a presentation by John Roskelley.

April 26th 2007 – Commission Meeting – Quincy, WA Staff reached a decision to recommend including the PASEA in Phase 2 of the Master Facilities Plan. The Commission voted to approve the staff's recommendation and include the PASEA in the Phase 2 study.

February 26th 2008 Scoping Notice is issued for the start of a 30 day Comments period for the
Park Master Plan

September 30th 2009 Public meeting in Spokane CenterPlace-regarding the MFP Draft EIS

August 12th 2010 Commission Meeting in Spokane. The Commission approves the Mt. Spokane State Park Master Facilities Plan. Deb Wallace was urged by Commissioners to bring the Ski Area proposal and land classification recommendations to the Commission for a decision as soon as possible.

February 16, 2011 Scoping notice goes out for the DNS Land Classification Action item at the
May 19th, 2011 Commission meeting in Spokane. Commentss taken for 30
days

May 18th, 2011- Meeting in Spokane at SFCC- special public meeting (7pm-9pm) Public was encouraged to go around the room and meet with Stewardship, etc, then submit their Commentss at a table

May 19th 2011, Commission Hearing, additional public Comments was taken, Commission Classified the runs as Recreation, tree islands as Resource Rec, and below C4 road as NFA

February 9th, 2012-Commission Hearing in Olympia where they took public testimony on the scope of the DEIS

April 26th-May 29th, 2012 DEIS Comments period

May 24, 2012-Commission Hearing in Yakima where public testimony was taken. Randy Kline updated the Commission on the SEIS process.

October 5th, 2012, Final SEIS issued, 30 day Comments and waiting period follows *December*

27th, 2012 Spokane County sent MS2000 proposal out to agencies for Comments *November 12,*

2013 Notice of Scoping Comments period starts

Comments: I am expressing my concern to the Washington State Parks and Recreation Department this 12th day of December, 2013. The PASEA must remain classified as "Resource Recreation".

Any proposed EIS must consider multiple facets including:

1) The impact on the visual character of Spokane County should this unwise land use decision continue. The 7 (seven) ski runs should be considered 'built' structures since the proposed plan is indeed the 'building' of multiple ski runs.

Mt Spokane is the single, defining visual beacon within Spokane County. This visual integrity of our shared, public, sky-line, will be forever, and irrevocably altered.

2) How is the installation of a "Red Chair" mitigating the visual impact to those property owners who have their view-shed altered?

3) Is alpine skiing a viable activity on Mt Spokane 20 years from now? Given the impact of Global Warming and Climate Change I question the validity of 4000ft as a measure of desirable snow conditions.

4) The EIS should clearly state that the expansion is located on the West side of Mt. Spokane. Chair #4 is in fact currently located on the North side of Mt Spokane and began operations two weeks after season opening in 2013-2014. Please explain how an additional chair on the Western aspect will foster extended seasons?

5) Where will additional vehicles be parked? Is there adequate capacity within the existing lodge to accommodate the anticipated crowds?

6) Mt Spokane has clear signage that "Uphill Travel" is strictly prohibited within the ski-area boundaries. How is this policy in the public interest of those back country enthusiasts which currently frequent the PASEA?

7) Summertime activities must also be included within the EIS. Biking and hiking activities will

dramatically increase due to the inevitable access roads which must be built to install the chair lift. The new chair must be studied for summertime operational impacts as most ski areas are now year-round operations, greatly increasing their revenue.

8) It must be admitted within the EIS that the harvest of this timber will mitigate the potential old-growth forest within the boundary of the proposed ski run(s).

9) The PASEA must be considered in totality, not just the 80 days of winter time ski-lift operations. Summertime impacts prepared by the State and wintertime impacts prepared by Mt. Spokane 2000 have to be considered concurrently. Allowing consideration of separate EIS's is contrary to common sense and good science.

I look forward to your published report as this third EIS is considered.

Comments: I'm writing on behalf of the proposed Mt. Spokane expansion.

This state park has many many uuses year round and the EIS study needs to reflect all the applications this mountain has, not just to us humans but to the animals and the forest as well. We want to do a variety of recreation. Expansion will not allow skiers and boarders who now use this area without a lift to continue. I like to snowshoe, too, and that will no longer be allowed. I understand that there's only 1/3 remaining of this gorgeous alpine forestland left of what used to be there. I'm a summer/fall hiker and I want to continue to use the land for this as well. Please consider ALL peoples and other aspects before opening this irreversible action to take place.

For me, personally, the ski park that's already on the mountain is more than enough.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: I am a member of the Spokane Mountaineers. My family moved to Spokane in 1969. My husband and I live near Mt. Spokane (off Madisen Rd). We moved to this area because of our love for Mount Spokane, its natural areas, wildlife, freedom from life's demands and most of all the rejuvenation of our souls while silently moving through the trails and sitting beside the many streams. This area is priceless and must be protected.

Please, please do not allow the expansion of the Ski area onto the western forested slopes. Please consider an Alternative in the Environmental Impact Study that improves the existing impacted part of the Ski Area (north, east and south sides) and a land classification that allows primitive recreation in the west side Proposed Alpine Ski Expansion Areas. I have hiked natural areas all my life and found a new joy in snow shoeing since retiring from my health care career. Once an area is disturbed it will never return to this same ancient beauty and diversity. I have seen wildlife, heard the chatter of squirrels and the songs of the birds. I have smelled the crisp air of early morning hikes, ice cycles from rocks and tree bows, soggy moss laden rocks and trees, I have looked upon the dew covered flowers and simply enjoyed the quiet of this stately mountain. I would be absolutely heart broken if the old growth forests were harmed and trails disturbed. I have seen mountain lion and big coyotes as well as a moose, and hawks during my travels. There are a multitude of wildlife species that simply should be allowed to live in THEIR environment without human craziness disturbing them.

I have reviewed The Lands Council Commentss on the scope of an EIS and I agree with the magnitude of importance in considering ALL of the areas outlined in their request, i.e., the impacts caused by development, an in-depth look at the economic and social impacts of the ski area, addressing concerns raised by the Spokane County Hearing Examiner regarding his ruling against a timber harvest, carefully analyze all the concerns raised by the WDFW, analyze all the concerns of the Department of Natural Resources' WA Natural Heritage Program

favoring protection as the Blanchard Creek Natural Forest, consulting with the WDFW and US Fish and Wildlife Service on focal species, a qualified biologist must be consulted regarding the wetlands and water courses and snow-making impacts, analyze the impacts of logging debris, analyze the impacts on precious rare species, analyze the impacts on clearing, grading and exposing ancient soil, analyze how expanding into the west side of the mountain will extend the season and bring in more skiers when they have an underutilized north-side life, analyze and determine the cost of adding intermediate runs to the existing footprint as opposed to creating new ones; an alternative option, analyze the impacts of the loss of key corridors and core wildlife areas; what is the mitigation for the loss of biodiversity, how will night time lights impact wildlife especially nocturnal species.

I support The Lands Council and Spokane Mountaineers "no action alternative" that will designate the PASEA area as Natural Forest forest. We must be willing to preserve these precious areas for the multitude of generations in the future and let go of the economic benefit for the few. Please do not degrade this natural habitat; it is so valuable.

Comments: I am a skier myself and have skied at Mt. Spokane several times. I have even ski/hiked up to the area in question via my own power.ie one can access that area without tress being destroyed and a life constructed. Why should a company who is "renting" be able to do such a thing? These tress belong to the people of the state of Washington and should not be sacrificed for material gain of a private person/company. I am fearful that the Mt. Spokane company will continue to fight this battle, spending lots of money for legal help etc...and that their money will win out over what is best for park and the people who enjoy it.
thank you,.....

Comments: This letter is my Commentss on the scope of the Environmental Impact Statement (EIS) being prepared to determine a formal land classification pursuant to Washington Administrative Code (WAC) 352-16 for the approximately 850 acre area known as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park.

My interest in Mount Spokane State Park includes protection and recovery of biodiversity including wildlife habitat, water quality, and forest ecosystems. I also enjoy the recreational experiences provided by the relatively undeveloped natural character that Mount Spokane State Park presently provides. I visit Mount Spokane State Park for numerous purposes, including hiking, snowshoeing, backcountry skiing, cross-country skiing, wildlife viewing, sightseeing, and photography.

First, I must say the geographic scope is far too limited. The scope the Washington State Parks and Recreation Commission (State Parks) uses is biased toward accepting the premises Mount Spokane 2000 uses to claim that developing the PASEA into a lift-assisted ski area is necessary for it to keep in business and adequately serve the skiing public. This bias began when State Parks failed to follow up on completion of the Master Facilities Plan.

State Parks thereby unilaterally rejected alternatives¹ that would likely serve expressed Mount Spokane 2000 needs² in the already developed footprint of the Mount Spokane Ski and Snowboard Park. State Parks must expand the scope of the proposed EIS analysis to make whole the Master Facilities Plan to better evaluate all recreational and ecological values of the entire State Park. At the very least, State Parks must expand the scope of the proposed EIS analysis to complete the Master Concession Plan for the current Mount Spokane Ski and Snowboard Park plus the PASEA.

There are other substantial problems with the limited range of alternatives being considered: Option 1, Option 2, and No Action.

One problem is that under the current management, there exist dangerous conflicts between snowmobilers and skiers on the Chair 4 road, which is not open to the public for any other motorized use except for snowmobiles. I have witnessed aggressive, threatening snowmobile riding behavior towards skiers along that road. State Parks

must expand the scope of alternatives

¹ In 2008 State Parks entertained a “Preliminary Proposed Action” for the Mt. Spokane 2000 Master Concession Plan that included “re-development and realignment of hillside and base facilities in the existing ski area...” (Appendix A MS2000 Preliminary Proposed Action.) Along with expansion into the PASEA, that Preliminary Proposed Action also included significant construction of new ski runs, ski lift relocations, and various infrastructure on the currently developed portion of the concession area.

² Those are to increase the amount of low-intermediate and intermediate level ski terrain.

to fully consider one that designates the entire PASEA as a Natural Forest Area or Natural Area Preserve, removing all public motorized use which is not compatible.

And frankly, another reason State Parks ought to be reevaluating its entire Master Facilities Plan, as discussed above, is because of the failure to curb illegal and dangerous snowmobile use in other areas of the Park. On multiple occasions I have snowshoed trails on Mount Spokane adjacent to where snowmobile uses are allowed—but inside forested areas where snowmobiles are **not allowed**—and observed snowmobiles or snowmobile tracks in areas where snowshoers are present, sometimes in large groups including children. It is only a matter of time before someone is hurt or killed because of this inherently dangerous conflict—and the Commission would rightfully be held accountable.

There is another reason that it is disingenuous to imply, as the scoping notice does, that “No Action” would truly manage the PASEA as a Natural Forest Area. Such a designation apparently would not allow another current use, that of backcountry skiing off-trail and down the slopes of the PASEA. As a backcountry skier who has used the PASEA, I would prefer to be allowed to continue that activity³. **But I would rather see this activity banned from the PASEA than have a classification that State Parks uses as a foot-in-the-door for allowing motorized or other more intensive recreational activities such as the Mount Spokane 2000 proposal.** My reasoning is that the wild character found in the PASEA deserves preservation for biodiversity and more contemplative recreation, which are purposes served by the Natural Forest Area or Natural Area Preserve classification.

So I urge State Parks to fully analyze a wider range of alternatives. Along with one that classifies the entire PASEA as a Natural Forest Area, this would also include an alternative that classifies the entire PASEA as a **Natural Area Preserve**. The latter classification would recognize the “scientific or educational value” to the community, including schools from grade school up through college. There is simply no other natural place like the old growth in the PASEA anywhere else in Spokane County or beyond which are accessible for educational facilities operating under today’s budgetary constraints.

The EIS must consider likely scenarios of climate change that could result in such low quality of the winter snowpack that there would be inadequate skiable snow over most of Mount Spokane by the middle of this century or earlier. That could certainly be the case if the previously delineated “critical snowline” moves upslope even a few hundred feet.

Old-growth forests provide significant wildlife habitat, help to minimizing flooding and improve air quality including significant carbon storage, all of which is even more crucial in the face of global climate change. The reasons for protecting old-growth forests, which make the PASEA such a special place, continue to accumulate, indicating the life-giving and supporting nature of these complex, interconnected ecosystems. Recent findings have shown the immense value of old growth forests for protecting carbon stores.

But old-growth forests are not just incredible stores of carbon, key wildlife habitat, sensitive plant species refugia, and biodiversity strongholds. Old-growth forests are spiritual places for humans, they are ancient living beings, they are a defining and irreplaceable part of our natural heritage, they are very important for recreation and science, they bring mental peace and well-

³ This might be possible with a hybrid alternative that combines Natural Forest Area and Natural Area Preserve classifications, or even a Resource Recreation Area classification in different portions of the PASEA.

2

being to many people, and our complex relationship with these forests might even represent the initiation of a modern form of traditional ecological knowledge. Certainly old-growth forests give our region, and Mount Spokane State Park, great cultural identity.

Comments: I am in strong opposition to the ski area expansion being planned by Mt. Spokane 2000. It seems that the decision to expand was made prior to any input from the public. There has been no transparency in the process.

Mt. Spokane is a STATE PARK! As such it belongs in its entirety to ALL residents of Washington State, not just to Mt. Spokane 2000. If one group is allowed to usurp even a small portion, it opens the door for that group or any other to do the same in the future. The particular portion in question happens to be the only old growth forest left in Spokane County. Once gone, it can never be restored. Losing it will cause deterioration to the habitat of both flora & fauna native to the area, not to mention the adverse impact logging has on the environment with erosion, invasion of weeds and water pollution.

I support and want analysis of a no-action alternative that will designate the proposed ski expansion area as a natural forest. It should & must be maintained in its natural state for this and future generations of Washington state residents and others to enjoy for generations to come. Please do not allow a natural treasure to be destroyed to benefit only a few people for three or four months per year.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed. My wife and I enjoy Mt. Spokane for Senior skiing and believe the proposed chairlift is good for the Spokane region.

Comments: Mount Spokane State Park is inestimably valuable because it is mostly unfragmented within uniquely large boundaries from the southern tip of the park north along its westerly forest slopes to the northeast. Accordingly, we urge the Commission to support permanent protection as natural forest area for this unique ecosystem as voiced by the public and state agencies. Ski area expansion into the irreplaceable old growth forest on the west side of the mountain is inconsistent with permanent protections.

Please consider the following:

The Spokane County Critical Areas Ordinance requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for; therefore, it should not be allowed.

A Master Concession Plan was to be part of the Mt. Spokane Master Facility Plan, but has never been completed. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes economic sense.

Address concerns raised by the Spokane County Hearing Examiner when he ruled against a timber harvest permit earlier this year.

Analyze all the concerns raised by the Washington Dept. of Fish and Wildlife (WDFW).

Analyze all the concerns of the Department of Natural Resources' WA Natural Heritage Program which

favors protection as the Blanchard Creek Natural Forest.

Consult with WDFW and US Fish and Wildlife Service on focal species, lynx, wolverine, and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants.

A qualified biologist should be consulted to delineate the location and impacts of the proposed development on wetlands and water courses. What are the impacts of snow-making to the above?

Analyze the impacts of leaving logging debris, which can attract pine bark beetle and spread white pine blister rust.

Analyze the impacts on a rare species, *Grylloblatta* now that an "independent expert" has determined that the populations deserve International Union for Conservation of Nature "Endangered" status. They have been found within the flagged line of the proposed chairlift.

Analyze the impacts on clearing, grading and exposing soil that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation.

Analyze how expanding into the west side of the mountain will extend the season and bring in more skiers when they have an under-utilized north-side lift.

Analyze and determine the cost of adding intermediate runs to the existing footprint as opposed to creating new ones.

Analyze the impacts of the loss of key corridors and core wildlife areas. How will they be mitigated? What about direct loss of habitats for sensitive flora and fauna: can they be mitigated? What is the mitigation for the loss of biodiversity?

How will night time lights impact wildlife? Can you mitigate those for nocturnal species?

We support and urge analysis of a no-action alternative that will designate the proposed ski expansion areas (PASEA) area as Natural Forest Forest.

Comments: I am and have been familiar with the current use of the Mount Spokane Park recreation since moving to Spokane in 1966. I have read publications about the history of Mount Spokane and its use as private property recreation starting before the turn of the 20th Century led by Francis Cook. Mr. Cook, with support of the Spokane area citizenry, intensely labored for years and their combined valiant efforts developed the mountain into a place of public recreation long before it became property of the State of Washington by donation. I have enjoyed conversations with those who ventured onto the mountain to ski at the *ski* area rope tow lift earlier in the 20th Century. Now additional ski area expansion is logical and needed.

Those who oppose the ski area terrain expansion and placement of a chair lift on the North West Side of Mount Spokane have no valid or rational basis for their objections. They simply are the current day naysayers of society who self righteously and wrongly believe they know what is best for the majority of citizens. These hypocritical environmental terrorists represent a barely perceptible numbered shrill minority.

The overwhelming majority of us familiar with the present and potential use of Mount Spokane State Park are of the unanimous opinion that no adverse environmental impact will occur by granting the ski area's application to construct the requested additional chair lift and expand the ski terrain. In fact, the mountain forest growth will be enhanced by appropriate thinning. Thinning creates stronger and larger trees that allow a more suitable and useful forest with less timber loss in the event of fire because the forest floor is not clogged with fuel. With thinning there

is decrease in the forest canopy which helps the animal habit by allowing more sunlight to the forest floor that increases growth of food for deer and elk and other animals. None of the animals that inhabit the area of the proposed development will diminish or be adversely affected by the winter ski season. The animals are not there feeding in the winter months. There is no significant old growth forest on the mountain and to assert the same is to reveal ignorance or fiend deceit. If an old growth tree can be found, they can remain in the appropriately thinned forest. If any old growth trees are found, and they would be few in number, they can remain as stalwart sentinels guarding a beautiful mountain that skiers can pass around through the gladed forest their way down the mountain slope.

Enough of these sue happy naysayers that self righteously attempt to impede the will and desire of the majority of citizens! They have nothing to offer except their myopic views that do not represent reality, rational analysis or truth. Strange as it may seem, some of these hypocritical naysayers applaud the extension of the cross country trails and pay no attention to the trees plowed over to make their passage convenient.

I request the Commission issue approval of the application to erect a chair lift on Mount Spokane State Park lands and thinning of forest all over the park ski areas.

Comments: I have been skiing for years on Mt Spokane. It is good as it is. I don't think we need to cut more trees to make something new. Leave trees along is my opinion. If fact, if you end up cutting the old growth, I will protest by not taking my friends and family to ski at Mt S. I'll go to 49 or Schweitzer.

Comments: I am writing to provide recommendations for the scope of the EIS concerning the land classification at Mt. Spokane State Park. I have been following and participating in the planning projects for the park for quite some time. The decision on the land classification for the area known as the PASEA is very important and has a tremendous potential to impact the quality and character of Mt. Spokane State Park.

I have been a frequent visitor to the park as an alpine skier, backcountry skier, climber, mountain biker, hiker, and trailwork volunteer. I am a long time member of the Spokane Mountaineers and Inland Northwest Backcountry Alliance. Through all of these roles I have had a chance to observe the park closely, and see how it has been used and cared for over the years. It is a wonderful place and we are so lucky to have it. Please consider the following recommendations for the scope of the EIS as you work to care for this vital resource.

EIS Scoping Recommendations

- Review the Spokane County Critical Areas Ordinance to determine any mitigation and compensation that potential development within the park would require.
 - Analyze the concerns that have been brought up by the Washington Department of Fish and Wildlife (WDFW), Department of Natural Resources, and Washington Natural Heritage Program. All three of these agencies have brought up serious concerns regarding development within the PASEA. The issues presented by WDFW are particularly concerning.
- Analyze the impacts to Focal, Rare, and Endangered Species for all of the options being considered for the land classification. This should also include impacts to nocturnal species that would be impacted by lighted ski runs that would result in expansion of the ski area.
- Examine the impacts to wild life corridors that exist in and around the state park, and in particular how changes to the land classifications and any development would adversely affect them.
- Analyze the option of designating the PASEA as Natural Forest ("no action alternative) on equal footing with the Recreation and Resource Recreation options presented in the scoping documents.
- Analyze the impacts of logging debris and soil disturbances on water, wildlife, and plant life that would result from the Recreation classification and proposed ski area expansion. This should also include spreading of noxious weeds.
- Analyze the current and long term financial stability of the present ski area concessionaire. It is my understanding that a Master Concession Plan was to be included in the Mt. Spokane Master Facility Plan, but has not been completed. It is critical that the concessionaire has the financial resources and long term strategy

for properly completing any new development. It is even more important that all facilities operated by the concessionaire can be properly maintained and environmental impacts to the land used by the concessionaire can be mitigated for the long term.

- Closely examine how well the current concessionaire is managing the environmental impacts of the area presently defined by the alpine ski area. How well the land, air, water, and wildlife are being cared for in this area will foreshadow how well they will be treated with any new development. If the concessionaire cannot properly maintain the resources they have already been entrusted, it would be unwise to entrust them with any more.
- Analyze the existing Recreation area defined for the alpine ski area to determine improvements that can be made. The area defined by the state park is limited, especially the higher elevation regions. It would seem wise to ensure the existing land designated for Recreation is being fully utilized.
- Analyze the impacts to other winter users of the park. This should include snowshoers, backcountry skiers, off trail X-C Skiers, and snowmobilers. All of these user groups need consideration to avoid having the alpine ski area users dominate all of the high elevation terrain inside the park. Two groups that are not well understood by park managers are snowshoers and backcountry skiers. These two populations are exploding and are becoming very heavy users of the park. However, some of the best areas of the park for these experiences are highly at risk if the Recreation classification is chosen and ski area expansion occurs.
- Analyze the impacts to spring, summer, and fall users of the park. Winter uses only occur about 1/3 of the year, yet the options being considered will have impacts year round. The option of expanding the ski area has the potential to greatly detract from user experiences in other times of the year.
- Examine the concept of a "hybrid" use area for winter users. This would fit best with the Resource Recreation and possibly the Natural Forest designations. Perhaps there would be way to allow use of some additional terrain for the ski area, but continue use by snowshoers, backcountry skiers, and snowmobilers. There may be some lower impact development that would make this possible. However, the environmental character of the unclassified area would largely be maintained as it presently exists.

I would like to thank you for your time and efforts on this project and wish you and your team the best of luck as it continues. If you have any questions regarding my recommendations or if I can be of any assistance when you begin environmental review please feel free to contact me.

Backcountry Ski Chair-Spokane Mountaineers

Member Inland Northwest Backcountry Alliance

Comments: We are writing to express our concern over the proposed expansion of Mt. Spokane Ski and Snowboard Park into the area known as the PSEA. My husband, Brent, has been a member of the all-volunteer Mt. Spokane Ski Patrol since 2003. We own a condominium at Snowblaze, just outside the state park boundary and we are long-time members of the Spokane Mountaineers. We use Mt. Spokane State Park year round to ski (both downhill and cross-country), snowshoe, hike, mountain bike, and pick huckleberries.

However, we are against expansion of Mt. Spokane Ski and Snowboard Park into the PSEA. We would prefer that Mt. Spokane invest funds in improving the road to the resort as well as improving or replacing Lodges 1 and 2. Mt. Spokane currently has 2/3rds of the alpine area surrounding Mt. Spokane and if you have ever taken a hike there in the summer, you will see that they are not very good stewards of the land they already manage. There is garbage, defunct maintenance equipment, and fuel waste left outside to pollute the environment and the groundwater (from which Snowblaze condos receives its water supply.) We would hate to lose the last 1/3rd to development, the effects of which would be irreversible in our lifetime. That area should be preserved as is for wildlife and future generations.

As for the argument that development will improve safety we respectfully disagree and think this area should continue to be open for undeveloped backcountry skiing, which is becoming increasingly more popular.

As for the argument that Mt. Spokane needs the new area to remain open and viable longer in the season due

to climate change, we again respectfully disagree. Unless major development is done on the backside, such as parking and a road, accessing the back side will still occur from the front. If there isn't enough snow on the front, skiers will not be able to access the new "red chair" and safely return to the front side. So, development of that area does not extend Mt. Spokane's ski season. However, we agree that climate change is a concern. Perhaps Mt. Spokane will not be able to support alpine skiing in the foreseeable future due to climate change. If so, we would, again, hate to see the loss of the trees and habitat in the PSEA to support a limited number of additional years of skiing.

Thank you for this opportunity to Comments. We hope the State Parks Commission will seek additional information on the environmental impact of expansion by Mt. Spokane Ski & Snowboard Park as well as plans for managing the alpine park going forward, including cost to tax payers.

Comments: I am writing to provide recommendations for the scope of the EIS concerning the land classification at Mt. Spokane State Park. I have been following and participating in the planning projects for the park for quite some time. The decision on the land classification for the area known as the PASEA is very important and has a tremendous potential to impact the quality and character of Mt. Spokane State Park.

I have been a frequent visitor to the park as an alpine skier, backcountry skier, climber, mountain biker, hiker, and trailwork volunteer. I am a long time member of the Spokane Mountaineers and Inland Northwest Backcountry Alliance. Through all of these roles I have had a chance to observe the park closely, and see how it has been used and cared for over the years. It is a wonderful place and we are so lucky to have it. Please consider the following recommendations for the scope of the EIS as you work to care for this vital resource.

EIS Scoping Recommendations

- Review the Spokane County Critical Areas Ordinance to determine any mitigation and compensation that potential development within the park would require.
 - Analyze the concerns that have been brought up by the Washington Department of Fish and Wildlife (WDFW), Department of Natural Resources, and Washington Natural Heritage Program. All three of these agencies have brought up serious concerns regarding development within the PASEA. The issues presented by WDFW are particularly concerning.
- Analyze the impacts to Focal, Rare, and Endangered Species for all of the options being considered for the land classification. This should also include impacts to nocturnal species that would be impacted by lighted ski runs that would result in expansion of the ski area.
- Examine the impacts to wild life corridors that exist in and around the state park, and in particular how changes to the land classifications and any development would adversely affect them.
- Analyze the option of designating the PASEA as Natural Forest ("no action alternative) on equal footing with the Recreation and Resource Recreation options presented in the scoping documents.
- Analyze the impacts of logging debris and soil disturbances on water, wildlife, and plant life that would result from the Recreation classification and proposed ski area expansion. This should also include spreading of noxious weeds.
- Analyze the current and long term financial stability of the present ski area concessionaire. It is my understanding that a Master Concession Plan was to be included in the Mt. Spokane Master Facility Plan, but has not been completed. It is critical that the concessionaire has the financial resources and long term strategy for properly completing any new development. It is even more important that all facilities operated by the concessionaire can be properly maintained and environmental impacts to the land used by the concessionaire can be mitigated for the long term.
- Closely examine how well the current concessionaire is managing the environmental impacts of the area presently defined by the alpine ski area. How well the land, air, water, and wildlife are being cared for in this area will foreshadow how well they will be treated with any new development. If the concessionaire cannot properly maintain the resources they have already been entrusted, it would be unwise to entrust them with any more.
- Analyze the existing Recreation area defined for the alpine ski area to determine improvements that can be made.

The area defined by the state park is limited, especially the higher elevation regions.

It would seem wise to ensure the existing land designated for Recreation is being fully utilized.

- Analyze the impacts to other winter users of the park. This should include snowshoers, backcountry skiers, off trail X-C Skiers, and snowmobilers. All of these user groups need consideration to avoid having the alpine ski area users dominate all of the high elevation terrain inside the park. Two groups that are not well understood by park managers are snowshoers and backcountry skiers. These two populations are exploding and are becoming very heavy users of the park. However, some of the best areas of the park for these experiences are highly at risk if the Recreation classification is chosen and ski area expansion occurs.
- Analyze the impacts to spring, summer, and fall users of the park. Winter uses only occur about 1/3 of the year, yet the options being considered will have impacts year round. The option of expanding the ski area has the potential to greatly detract from user experiences in other times of the year.
- Examine the concept of a ¹¹hybrid" use area for winter users. This would fit best with the Resource Recreation and possibly the Natural Forest designations. Perhaps there would be way to allow use of some additional terrain for the ski area, but continue use by snowshoers, backcountry skiers, and snowmobilers. There may be some lower impact development that would make this possible. However, the environmental character of the unclassified area would largely be maintained as it presently exists.

I would like to thank you for your time and efforts on this project and wish you and your team the best of luck as it continues. If you have any questions regarding my recommendations or if I can be of any assistance when you begin environmental review please feel free to contact me.

Backcountry Ski Chair- Spokane Mountaineers
Member Inland Northwest Backcountry Alliance

Comments: I have already submitted a letter attempting to express my personal concerns on this subject, but I find the Comments made in the attached letter below so much more to the point and so well spoken, that I would like to say that I 'second' these remarks.

We are writing to express our concern over the proposed expansion of Mt. Spokane Ski and Snowboard Park into the area known as the PASEA. My husband, Brent, has been a member of the all-volunteer Mt. Spokane Ski Patrol since 2003. We own a condominium at Snowblaze, just outside the state park boundary and we are long-time members of the Spokane Mountaineers. We use Mt. Spokane State Park year round to ski (both downhill and cross-country), snowshoe, hike, mountain bike, and pick huckleberries.

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viable longer in the season due to climate change, we again respectfully disagree. Unless major development is done on the backside, such as parking and a road, accessing the back side will still occur from the front. If there isn't enough snow on the front, skiers will not be able to access the new "red chair" and safely return to the front side. So, development of that area does not extend Mt. Spokane's ski season. However, we agree that climate change is a concern. Perhaps Mt. Spokane will not be able to support alpine skiing in the foreseeable future due to climate change. If so, we would, again, hate to see the loss of the trees and habitat in the PSEA to support a limited number of additional years of skiing.

Thank you for this opportunity to Comments. We hope the State Parks Commission will seek additional information on the environmental impact of expansion by Mt. Spokane Ski & Snowboard Park as well as plans for managing the alpine park going forward, including cost to tax payers.

Comments: I am a lifelong user of Mt Spokane State Park.

The state's largest State Park and the County's largest old growth exist on Mt. Spokane. The western flank is the richest in flora, fauna, and provides a wildlife corridor running for miles above the valley. I have hiked, biked, birded, berried, and snowshoed that undeveloped side. Yes, and I down hill and cross-country ski on the developed side. That system works perfectly. Mt. Spokane deserves to be protected from more UNNECESSARY ski runs. The cross country runs have been developed more on the east side. Do that for down hill runs.

Require the Master Concession Plan to be completed. It will show expansion is not needed economically, although for me the environmental reasons are tops.

State agencies have attested to the natural diversity that survives on Mt. Spokane: The Spokane County Hearing examiner saw fit to nix a timber permit this year.

DNR favors protection.

US Fish and Wildlife favor protections.

Please, save the finest State Park east of the Cascades! No action allowing new ski runs, new timber cuts, new power poles, new lights, new noise on the old growth side!

Comments: Once again, the native, old growth forest on Mt. Spokane is at risk. The Washington State Parks Commission is again ignoring the public and state agencies and proposing ski expansion into the irreplaceable old growth forest on the west side of the mountain. As the Washington State Nature Heritage Program put it: One of the greatest values of Mount Spokane State Park is its large size and low level of fragmentation of forests within its boundaries. Those mostly unfragmented forests extend from the southern tip of the park **north along the westerly slopes** of Mt. Spokane to forests off the park to the northeast.

We need you to voice your support for permanent protection, as natural forest area, for this unique ecosystem. Commentss on the scope of an Environmental Impact Statement (EIS) are being taken until **December 12th**. **Please asks that the EIS consider the following:**

The Spokane County Critical Areas Ordinance requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it should not be allowed. WDFW says this is important and not replaceable.

A Master Concession Plan was to be part of the Mt Spokane Master Facility?? Plan, but has never been

completed. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically.

Concerns raised by the Spokane County Hearing Examiner when he ruled against a timber harvest permit earlier this year.

Concerns raised by the Washington Dept of Fish and Wildlife (WDFW) in its letters to the Commission dated January 29, 2007, February 29, 2007, March 14, 2008, February 12, 2012, January 10, 2013, and any other correspondence between WDFW and the Commission and MS2000 that is appropriate for consideration. WDFW does **not** favor expansion of ski lifts and groomed trails into the proposed expansion area.

Concerns of the Department of Natural Resources' WA Natural Heritage Program (WNHP) in its letter of February 15, 2007. Please note in the scoping process the Heritage Programs continuing support for the proposed Blanchard Creek Natural Forest, and its general support for the study of old-growth/special forest types that the Heritage Program completed in 1993 for State Parks.

Consult with WDFW and USFWS on focal species, lynx, wolverine and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants.

A qualified biologist should be used to delineate the location and impacts of the proposed development on wetlands and water courses. What are the impacts of snow-making to the above?

Leaving logging debris can attract pine beetle and spread white pine blister rust.

Analyze the impacts on a rare species, *Grylloblatta* now that have been found within the flagged line of the proposed chairlift.

Clearing, grading and exposing soils will occur. What impacts will result including noxious weeds, sedimentation into Blanchard Creek, and riparian area vegetation.

Analyze how expanding into the west side of the mountain will extend their season and bring in more skiers when they have an underutilized north-side lift.

Please analyze and determine the costs for adding intermediate runs to the existing footprint as opposed to crating new ones.

Loss of key corridors and core wildlife areas that are really important. Can they be mitigated? What about direct loss of habitats for sensitive flora and fauna, can they be mitigated?

What's the mitigation for the loss of biodiversity?

How will night time lights impact wildlife and can you mitigate those for nocturnal species?



December 12, 2013

Washington Parks and Recreation Commission
Attention: Randy Kline, Environmental Program Coordinator
1111 Israel Road S. W., Olympia, WA 98504-2650

Subject: Comments on Scope of EIS re Mount Spokane State Park (MSSP) Proposed
PASEA Expansion

Dear Commissioners and Mr. Kline,

The Lands Council would like to submit Commentss for the scoping for the proposed EIS at Mt. Spokane State Park. We are a conservation organization with over 1000 members in Spokane County. We have advocated for protection of forests, rivers, wildlife and fish for three decades. We are also members of the Save Mt. Spokane Coalition and have been very involved in protecting the ecological values on Mt. Spokane.

We are concerned that once again, the Commission is limiting the scope of its analysis to the PASEA, and is failing to look at the existing and potential operations of the Mount Spokane Ski and Snowboard Park. This limitation also results in the omission of analysis of cumulative environmental impacts within the currently developed footprint of Mount Spokane Ski and Snowboard Park, which are highly relevant to the cumulative effects of the proposed expansion.

One of the stated purposes of expansion is increase the amount of low-intermediate and intermediate level ski terrain. In 2008 the Parks and Recreation Commission entertained a "Preliminary Proposed Action" for the Mt. Spokane 2000 Master Concession Plan that included re-development and realignment of hillside and base facilities in the existing ski area. Along with proposed expansion into the PASEA, that Preliminary Proposed Action also included significant construction of new ski runs, ski lift relocations, and various infrastructure on the currently developed portion of the concession area.

Expanding the skiable terrain within the existing developed footprint has the potential to improve the Mount Spokane Ski and Snowboard Park to better serve low-intermediate and intermediate level skiers; however since that option has never been analyzed neither the Commission or the public knows what that potential is. That same Preliminary Proposed Action also included significant additions of ski runs on the north facing side of Mount Spokane, potentially fulfilling another claimed purpose of the expansion, which is to increase the amount of terrain that has better long term snow accumulation, retention capability and snow quality available within the ski area.

We ask that the following be analyzed in an EIS:

The Spokane County Critical Areas Ordinance requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it should not be allowed. Karen Divens in her March 14, 2008 letter to the Washington State parks and Recreations Commission noted on page 2, number 3: “Loss of un-fragmented mature/old growth habitat needs to be evaluated from the standpoint that this is habitat is not replaceable in Spokane County.” All the mitigation needs to assess the effectiveness, feasibility and expense of the mitigation.

Analyze the impacts of an expanded ski area on Priority Habitat in the PASEA as defined in the CAO chapter 11.120.060 on aspen stands, elk habitat, freshwater wetlands, in-stream, moose habitat, old-growth-mature forests, riparian, snags and logs. Best Available Science should be used in the EIS.

Please analyze the PASEA for its potential to be a scientific and educational natural classroom since it's the best example of old growth forest in Spokane county, and how that would be lost by ski expansion.

A Master Concession Plan was to be part of the Mt Spokane Master Facility Plan, but has never been completed. The June, 2010 Mount Spokane State Park Master Facilities Plan Draft EIS stated:

The Master Concession Plan is expected to be completed in 2010. It will require supplemental environmental information to compliment the Master Facilities Plan EIS, and will address any potential adverse environmental impacts associated with ski area development and expansion into the Potential Alpine Ski Expansion Area.

However in 2010 that was pushed back to 2011:

The Master Concession Plan is expected to be completed in 2011. It will require supplemental environmental information to compliment the Master Facilities Plan EIS, and will address any potential adverse environmental impacts associated with ski area development and expansion into the Potential Alpine Ski Expansion Area.

(August 2010, Mount Spokane State Park Master Facilities Plan Final EIS.)

As far back as 2003, the Mount Spokane State Park Management Plan stated:

Park Recreational Resource Management Program: As part of the park concession program park staff should coordinate with region and headquarters Programs and Services staff to work collaboratively with the concessionaire to determine desired level of concessionaire involvement and management of a wide range of programs and facilities for both winter and summer recreation, visitor services, interpretation and education. Encourage programs that expand services to the public within the financial capacity of both the concessionaire and State Parks to provide. Concessionaire management potentially could include environmental education programming, Nordic ski area operation, snow-parks, tubing runs, visitor center operations, and a wide variety of improvements to the existing concession area. Long range plans for concessionaire programming should be an integral part of the concession master plan.

Without a Master Concession Plan, Mount Spokane 2000 has been able to avoid disclosing its comprehensive future plans (potential significant construction of new ski runs, ski lift relocations, various infrastructure, etc.) for serving park visitors, including for the currently developed portion of the concession area. We ask that a Concession Plan be completed as part of the EIS, which would enable the disclosure of full environmental and economic impacts of concessionaire operations and other park management. Essentially a business plan, a Master Concession Plan would help guide both Park and concessionaire.

The EIS should analyze and disclose the economic impacts of the operations of the Mount Spokane Ski and Snowboard Park. Unlike other ski areas in Washington, this area is heavily subsidized by the taxpayers of the State. How much subsidization has already been provided to date? The amount of subsidies that Mount Spokane Ski and Snowboard Park will need to stay operational in the future could certainly be substantial. There was also a claim that the new chairlift would bring in \$100,000 in extra revenue to State Parks every year. We analyzed this claim and found that skier visits would have to double for this to occur, which is extremely unlikely. The EIS should have an analysis of the financial impacts of the various alternatives.

Funding for other State Parks and for other services and amenities at Mount Spokane State Park has been greatly reduced. Taxpayers and legislators and other government officials deserve to be informed as to how much further sacrifice will be required to make to keep this ski area operational. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically. The EIS must analyze the effectiveness, feasibility and expense of an expanded ski area.

The Oct 2013 SE Group report, on page 9, claims that the largest part of the ski market is for low intermediate and intermediate ski terrain. Other information in the SE Group report is wrong, so we ask that this claim be analyzed as being accurate. We also ask that an alternative that classifies the PASEA as a natural area also analyze the costs and suitability of adding intermediate runs to the existing footprint. The SE Group report makes the statement that an increase of intermediate level runs will make Mt. Spokane

more attractive to skiers, but they have not shown any documents or any analysis or study that proves that. This claim needs to be analyzed.

The expansion of the ski area must be analyzed financially with consideration that other nearby ski areas are also planning to expansions, in particular Lookout Pass. Will an expansion actually be competitive with other ski areas that may expand?

The ski and snowboard area typically operates 4-5 months of the year, while visitor opportunities involving the use of facilities are non-existent the rest of the year. Summer hiking, bird watching, equestrian and mountain biking could all be impacted by development of the west side of the mountain. What are the impacts of the proposed expansion on summer recreation and lost opportunities of investment in a chairlift versus improving the existing ski area facilities?

Please analyze financially, effectively and socially how the Mt. Spokane Ski and Snowboard Park could market themselves as a unique ski area in the region without having to expand. Analyze demographic (age, race, gender, disability, income, etc.), recreation, urban and population trends to help determine what market niche Mt. Spokane can fill in its existing framework, without having to expand.

It will be important for the EIS to address concerns raised by the Spokane County Hearing Examiner when he ruled against a timber harvest permit earlier this year. The burden of proof in the appeal belonged to The Lands Council to show that our factual assertions were true (No. 85) and they were with “a preponderance of evidence” (No. 2 of part 2. page 32) and the Hearing Examiner ruled in our favor. From that Decision, here is a list of issues that need to be addressed in the EIS:

No. 93: The HMP needs to be prepared by a “qualified biologist” and it wasn’t. currently the “Qualified Biologist “ is under negotiation after being taken to the Growth management Hearings Board against the County because the County’s new definition is not adequate.

No. 97. The Lynx, a federally listed threatened species needs mitigation. MS 2000 denied that in its post hearing brief. No. 100: MS2000 neglected to provide a draft HMP on lynx to U.S. Fish and Wildlife Service.

No. 99: Good habitat exists for 21 focal species in the PASEA during some parts of the species life stages. All those species, along with their various life stages need analysis as far as being feasibly, effectively and economically mitigated. No. 104: The long and short term impacts were not quantified in the HMB.

No.102. Analyze the feasibility, effectiveness and economics of all the impacts to wildlife on all the activities of building the project, using the runs and trails, in all the seasons by all recreations and the maintenance of the trails and runs.

No. 107: Polygons (see no. 105 and106) are important for wildlife (Pacific Biodiversity Institute)and these habitats were not discussed in the SEIS and HMP. They need to be analyzed in the EIS in studied for any mitigation.

No. 108: Analyze for old growth characteristics on the forested strands of the site, and the mitigation must include economics and feasibility of the mitigation. See also No. 110: Trees that are sub-alpine need to be determined for old growth because of their elevation they won’t reach large diameters, but could still be old growth.

No. 109: Identify all the acres on the site that meet old growth conditions. 33 acres in the previous draft SEIS had satisfied two important old growth attributes. They are located on the west side. the impacts of ski expansion must be mitigated fully, that is financially, feasibly, and efficiently.

No.111: The effects of (as admitted By Mr. Towey, the biologist) the ski expansion will fragment biodiversity areas, corridor, old growth forest, riparian and moose and elk priority habitat. All this must be analyzed for costs, feasibility, effectiveness, and mitigated.

No.131: All the riparian buffers during timber harvested are subject to mitigation and must be analyzed as to cost and feasibility, and all the long term direct and indirect impacts to streams and stream channels.

No. 134: When the tree stumps are cut to the ground after the snow is gone, and other cleanup happens the effects of that need to be analyzed on the streams and riparian buffers, and mitigated.

No. 135: All wetlands must be studied by a qualified wetland specialist according to the standards found in the Washington State Wetlands Delineations Manual or as amended, especially the one in the southeast part of the site. A no net-loss of wetlands must be achieved according to the Spokane County CAO; D2.

No. 151: Any Pips of the Type Np streams should be studied for wetland characteristics and if so decided, should have a thorough wetland report done on them as well as a site description.

No.153: All the wetlands identified in the habit polygons by Pacific Biodiversity Institute should be evaluated and the long-and short term impacts studied for possible ski expansion. From their 2010 Biological Survey:

According to the Biological Survey conducted by Pacific Biodiversity Institute (PBI), Biological Surveys Conducted in the SEIS Analysis Area at Mt. Spokane State Park During 2010:

"Polygons with characteristics of old growth forests were identified in the field and again following our data analysis. Old growth forests were characterized as stands with more than 8 trees per acre over 20 inches in diameter, with tall trees, large snags, canopy cover greater than 50% and 2 or 3 canopy layers. We identified 14 polygons as old growth forest and noted these in the polygon database. There are many other polygons that may contain potential old-growth forest or at least some of the attributes that comprise old-growth forest conditions."

"There are significant areas of old-growth forest within the BSA. These forests provide habitat for wildlife species dependent on late-successional forest condition. Much of the rest of the forests within the BSA also have some old, large trees and are moving toward old-growth conditions."

In addition the EIS must analyze the migration routes/corridors and landscape linkages of wildlife between Dishman Hills, the Selkirk Mountains to the north, and other natural areas. What are the impacts of an expanded ski area on, especially, the 21 focal species.

Moose are on the decline in the lower 49, and Washington still seems to have a decent population. Moose are found on Mt. Spokane and they spend some time in dense, native forests. They must be taken into special consideration during the EIS analysis.

Lynx have been seen on Mt. Spokane and would use the dense, native forest for denning habitat. How will fragmenting the largest extent of this habitat in Spokane County impact their recovery plans. You must consult with US. Fish and Wildlife Service.

Wildlife who rely on medium and high elevation native forests will suffer from both climate change and the loss of habitat from the expansion plans. This must be analyzed in the EIS as far as reducing their habitat. Please read this study on vertebrates as part of scoping:

<http://www.sciencedaily.com/releases/2013/07/130709175747.htm>. And the importance of promoting biodiversity (which means preserving habitat) on plants and pollinators. Again, a reduction of old growth forest will decrease biodiversity:

<http://www.sciencedaily.com/releases/2011/11/111106151459.htm> And extinction from global warming on plants and animals on a climate change collision.

<http://www.sciencedaily.com/releases/2012/01/120103211054.htm>

The flora and fauna on Mt. Spokane belong to the citizens of Washington State and are managed by the Washington Department of Fish and Wildlife. From a Feb. 29. 2007 letter from Karin Divens of WDFW: “WDFW has serious concerns with the proposal to expand the ski area to the northeast within the Mount Spokane State Park boundaries considering unavoidable impacts to native old growth forest habitat, ecological biodiversity, inconsistencies with regional and Statewide plans, mandates of the Washington State Parks and Recreation Commission, the Mission Statement of Mount Spokane State Park, and the mandate of WDFW to protect and enhance the State’s fish and wildlife resources.” This mandate must be analyzed in the EIS process.

Analyze all the concerns raised by the Washington Dept. of Fish and Wildlife (WDFW) In particular the letters from Karin Divens, Biologist with WDFW dated Feb. 29, 2007 and March 14, 2008 where she states that WDFW doesn’t not want expansion into the PASEA but instead the area designated at Natural Forest Area. In her 2007 letter she mentions that the old growth “similar forest cannot be found anywhere else in the Spokane County regional area, nor replicated.” It is under the management of non-profits such as the Parks Commission that this has been maintained. “This is what makes the Mount Spokane State park property unique and it is this complexity that supports high species biodiversity and provides important refuge habitat for large ungulates (like moose and elk) and rare forest carnivores (lynx.)” And please read the letters from the WDFW 2011 and 2012 that expressed concerns with the proposed ski expansion outlined in the Spokane County Hearing Examiners decision on the Timber Harvest Permit from nos. 111 to 126.

Analyze all the concerns of the Department of Natural Resources’ WA Natural Heritage Program who favors protection as the Blanchard Creek Natural Forest. Department of Natural Resources letter February 15, 2007:

“The forest vegetation communities composing the Blanchard Creek Natural Forest are representative of the subalpine and mid-montane forests of the Northern Rocky Mountains. Although these communities may be relatively common, their occurrence in a continuous forest block in a natural, unmanipulated condition is an uncommon quality. The area warrants special recognition and attention so that it continues to add to the diversity of the park as an important

natural destination in Washington. The Washington Natural Heritage Programs strongly recommends that any ski area expansion be limited to the east side of Mt Spokane and the Blanchard Creek Natural Forest on the west remain intact and not be developed.”

Please analyze this part of Mt. Spokane as an “important natural destination in Washington” and one within our state park system.

Consult with WDFW and the U.S. Fish and Wildlife Service on focal species, lynx, wolverine and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants. Analyze the failures of the Timber Harvest Permit to adequately address the needs of Lynx and Northern goshawk as outlined by the Spokane County Hearing Examiner in his Findings, Conclusion and Decision (File No. B-1203366). Please read nos. 97-100 on lynx and 124-126 on goshawk.

A qualified biologist should be used to delineate the location and impacts of the proposed development on wetlands and water courses. Snowmaking has sometimes been mentioned as an option. What are the impacts of snow-making to these wetlands?

Analyze the impacts of leaving logging debris, which can attract pine bark beetle and spread white pine blister rust? The timber harvest plan from January 2013 said that any trees cut would be laid across the new runs, which would seem to require a deeper base and possibly later opening date - this should be discussed in the EIS.

We are concerned that qualified personnel will not be used to prepare the EIS. Mt. Spokane 2000 used an unqualified biologist to prepare a Habitat Management Plan, and the errors in the SE Group Report indicate they do not have the expertise to prepare an EIS. Consider having a WDFW biologist and staff write the EIS, or be a part of writing it since they have the mandate to protect Washington's flora and fauna.

The scope of the EIS should include an analysis of the impacts to *Grylloblatta* now that an "independent expert", James Bergdahl, has determined that the populations deserves IUCN (International Union for Conservation of Nature "Endangered" status. based on the publication of Schoville & Graening's *Grylloblatta* assessment. *Grylloblatta* core habitat area on Mt Spokane appears to be associated with subalpine forest near the talus fields near the summit, however they can be found in forest habitat lower on the massif. They have been found in the blue-flagged that is the location of the new ski lift.

"The limited nature of grylloblattid habitat presents an imminent threat to the survival of these species. This threat is compounded in Grylloblattid lineages due to rapidly shrinking habitat. Grylloblattid species were designated as Near Threatened, Vulnerable, Endangered, and Critically Endangered under IUCN (2001) Red List criteria (Table 1)." From: Jarvis & Whiting (2006, p. 235).*

*Jarvis, K.J. & M.F. Whiting, 2006. Phylogeny and biogeography of ice crawlers (Insecta: Grylloblattodea) based on six molecular loci: designating conservation status for Grylloblattodea species. Molecular Phylogenetics and Evolution 41: 222-237.

Jarvis & Whiting summarized known records of *Grylloblatta* in the Pacific Northwest, but do not list Mt. Spokane. The closest records they have are in northern Idaho. Bergdahl's discovery of gryllos on Mt. Spokane in 1996 may be the first records of them being there.

As Bergdahl states, "*The grylloblatta on Mt. Spokane are probably a subspecies for the Rocky Mtn species Grylloblatta campodeiformis. However they could be more closely related to the Washington Cascade species since my trapping studies of forest invertebrates on Mt. Spokane clearly document the occurrence there of some disjunct coastal forest carabid beetles. These species probably dispersed eastward from the coast into the interior from the North Cascades via an ancient cold-forest corridor that existed along the International Border at the close of the Pleistocene. The Mt. Spokane gryllos may have arrived via the same pathway. Only gene analysis will be able to determine the paleobiogeography of Mt. Spokane's "ice crawlers".. People are continuing to work out in more detail the Pacific Northwest's Grylloblatta phylogenetics today.*"

It is clear that there should be a lot more information on these species before logging old growth since their decline is related to habitat loss and they have a limited habitat.

Analyze the impacts on clearing, grading and exposing soil that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation.

Analyze how expanding into the west side of the mountain will extend the season and bring in more skiers when they have an underutilized north-side lift. The SE Group Report on page 6 says the expansion is needed because of climate change. The expansion is in the western forest, not the "northerly-facing terrain" as the report says. The possibility that the old growth forest of the western slopes provides protection from the winds and the warming sun for the north-side lift, and thus greater protection from the changes global warming will bring need to be analyzed. Where is the data that measures snowpack depths at various points on the mountain as the same elevation for several years? This data needs to be known in order to adequately determine if indeed expanding into the west side will provide protection from future climate change.

How can you reasonably guarantee to the users and tax payers of the Washington State Parks System that the west side elevations will protect a ski area expansion from global warming? The north side chair, chair four currently exists, and you need to prove that it has actually increased the skiing season by having more snow on the north side. You should have a model for your theory that north side snow has better skiing so please analyze this theory. There has been discussion of moving Chair 4 base uphill to be out of a wetland and into a more reliable snow zone. Since this could impact the economics of the ski operation this should be part of the EIS. This tool from US Geological Survey indicates the average winter temperature will increase by 2 degrees centigrade in the future - how will this impact ski area operations?
http://www.usgs.gov/climate_landuse/clu_rd/nex-dcp30.asp

And there is this study that should be analyzed, since precipitation clearly impacts operations and profitability. How have the precipitation patterns changed in the last 50 years?:
<http://www.sciencemag.org/content/early/2013/11/27/science.1242335.full.pdf> Please analyze the reduction of winter winds in the PNW due to decreased precipitation.

Analyze how an expanded ski area will exacerbate the negative impacts of global warming in the state park. An increase in traffic, roads, vehicle emissions, and people will increase greenhouse gas emissions in the park. The state of Washington held Climate Legislative Executive Workshop (CLEW) hearings this fall around the state to get citizen input into reducing greenhouse gasses. Analyze the trend of reducing our carbon footprint at ski resorts, and please read this article for more information on how some ski resorts are using alternative energy on their slopes.<http://skiareacitizens.com/>. There's also an environmental Ski Area Scorecard and the lowest score in the west went to Mt. Spokane because of its PASEA expansion proposal.

Analyze the fragmentation and loss of old growth forest in the context of public forests that exist within the state. Public forests in the state of Washington have experienced a doubling in private development since 1970. Even though only a part of the PASEA will be developed, the infrastructure to go along with that will increase. The management issues of the increased development need to be analyzed within the context of all public forests in Washington State because they belong to all the citizens of the states and we need to look at the cumulative effects of edge development on public forests in the state. Please see this study:

<http://www.sciencedaily.com/releases/2013/12/131203161735.htm>

Analyze the impacts of the loss of key corridors and core wildlife areas. How will they be mitigated? What about direct loss of habitats for sensitive flora and fauna, can they be mitigated? What is the mitigation for the loss of biodiversity? Please include this study in your scoping for biodiversity on Mt. Spokane and how an expanded ski area will negatively impact it:
http://www.rco.wa.gov/documents/biodiversity/EXECSUMMARY_FINALcomplete.pdf This is the State Biodiversity Executive Study. Biodiversity matters and the Parks Commission has an important role in promoting and protecting biodiversity, according to this report.

Analyze the historical context of the importance of the old growth forest on Mt. Spokane. The Oct. 2013 SE Group Report claims that the PASEA was the original site of lift facilities, trails and lodges. They provide no historical proof of that and we contend they are incorrect. A 1950s Metzger's Map of Spokane County attached shows the lodge was south of the PASEA. The tow rope was just inside the PASEA but it was used in existing clearings. Trees were not cut for its use.

Preserving the forest was important to early citizens:

“Mount Spokane had long been logged, especially the eastern slope. Even the park's largest early land donor, the A. F. Linder family, retained logging rights to some of their former property. Yet conservationists worked hard to preserve private stands of virgin timber on the mountain. In the spring of 1939, Mrs. Polly Mitchell Judd of the 'Save the Forests of Mount Spokane' committee, assisted by The Spokane Federation of Women's Clubs, spearheaded a movement to raise \$3,000 to purchase such a property, a difficult challenge during the Depression. Crucial to the effort were the writings and speeches of Cheney Cowles who stated: “Preserving the timber is important, not only from the standpoint of retaining the beauty of the drive to the summit of the mountain, but also to forestall a serious fire hazard which would be

the certain result of the slashings left by lumbering operations” (Cowles, 5). "Push Program to Save Mt. Spokane Trees", Spokane Daily Chronicle, April 12, 1939.

and "Win MT. Spokane Forest Battle, Jun 19, 1939, Spokesman-Review.

http://www.historylink.org/index.cfm?DisplayPage=output.cfm&file_id=7819

Please see the map and a photo at the end of this document.

How will night time lights impact wildlife and can you mitigate those for nocturnal species? Light Pollution is a well-known problem for wildlife and humans and is of growing concern for biologists. It has been proposed at times for the expansion area, so please analyze the impacts.

Analyze with documentation the real need for emergency response to any injured or lost skiers within the PASEA. This needs to be based on record keeping, not on assumptions or estimates. SE Group makes the claim that it's on a weekly basis, but offers no proof. Where is the data from the Mt. Spokane branch of the National Ski Patrol? Backcountry skiers and snowboarders venturing beyond the developed boundaries see the out-of-bounds signs and markers the concessionaire is obligated to maintain via the Concession Agreement, so we suspect there may not be many injured or lost skiers and having a new lift and runs might result in the same number anyway.

Analyze how the reclassification to Recreation would “provide park managers new tools to protect park resources” as stated on page 4 of the SE Group Report. This is an apparent assumption, and one that needs to be justified by data. Analyze the cost of potentially having more employees and park rangers in a bigger ski area.

Developing the west side would change the skiing experience for both backcountry skiers as well as those accessing the west side from the existing lift system. Untracked skiing and snowshoeing through glades and trees would be lost and backcountry visitors would be forced to travel to areas other than Mt. Spokane for this experience. It is precisely the ungroomed recreational opportunities that they seek. This should be analyzed in the EIA

Analyze the relationship to Mission, Vision and Core Values of the Washington State Parks and Recreation Commission in the context of expanding the ski area into the PASEA. How will cutting exemplary old growth fit with the value of stewardship preservation into perpetuity? How will universal access to recreations, education, artistic, and cultural opportunities on Mt. Spokane be enhanced, and implemented by an expanded ski area? A ski area already exists. How will NOT providing upgrades alone enhance the access opportunity in Mt. Spokane? How is expanding the ski area connecting “all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhances their lives?” The ski expansion is for a small segment of people who already have a ski area. How does it reach out to all Washingtonians in a diverse manner?

How will expansion into an old growth forest, the only kind in Spokane County, for a ski area make the destination cherishable and “with natural, cultural, recreational, artistic and interpretive experiences that all Washingtonians, enjoy, appreciate and proudly support.” Mt. Spokane is our largest state park, and while all state parks can't be everything to every

Washingtonian, how is an action for just one part of the recreational sector meeting the vision when we already have a ski area on Mt. Spokane? Analyze the mission, vision and core values within the context of four seasons, and not just as winter recreation.

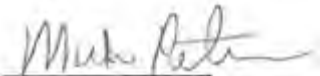
Analyze how the EIS process will be meaningful to the public and ensure participation, support for one another and show excellence when the previous process was not? That is, the Timber Harvest Permit was allowed without an EIS being done. The Timber Harvest Permit was very inadequate, and granting of the permit was reversed. That should have only proceeded with an approval of the project. There is no Concessionaire Plan and the law was broken by not following SEPA. The Division 11 Court of Appeals clearly stated this:

"Over 40 years ago, with the adoption of SEPA, we first read in Washington law that each generation is trustee of the environment for succeeding generations. We read also that it is the continuing responsibility of the state and its agencies to act so we may carry out that trust. RCW402302(1C). SEPA demands that this trust be more than merely a stirring maxim or artful slogan. Instead, it is the quickening principle in the application of the statute. Consistently with the statute's purpose, the Commission's failure to prepare an EIS for the 2011 classification decision violated the terms of SEPA and its rules and was contrary to governing case law.

We affirm the trial court's ruling that the Lands Council had standing under SEPA to bring this action. We hold that SEPA required the Commission to prepare an EIS for its May 2011 classification decision and, accordingly, we reverse the trial court's summary judgement order dismissing the Land Councils' claims under SEPA."

In conclusion, The Lands Council supports and want analysis of a no-action alternative that will designate the proposed ski expansion area (PASEA) as Natural Forest Area, as well as analyze a Concession Plan for the operation of the Mt Spokane Ski and Snowboard Park. Mt. Spokane State Park is a valuable asset to the citizens of Washington State and the controversial nature of the proposed ski area expansion warrants a comprehensive look at how to best protect the park, while allowing a wide range of recreational activities. Thank you for the opportunity to Comments.

Sincerely, Mike Petersen



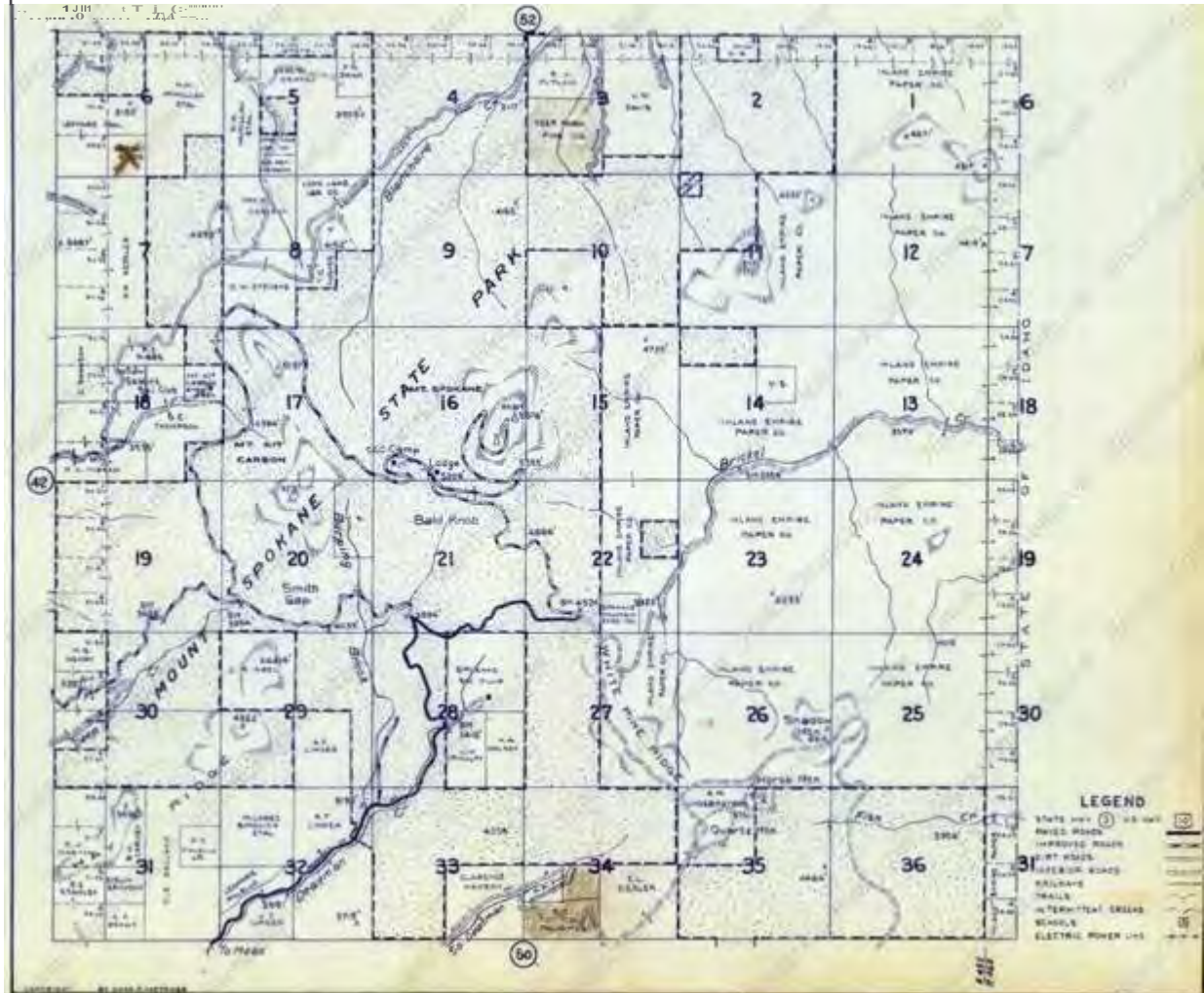
25 W. Main Ave., Ste. 222 Spokane, WA 99201, Tel. (509) 838-4912, Fax (509) 838-5155,
<http://www.landscouncil.org>



Aerial view of Mount Spokane looking northwest circa 1935 (Oestreicher Collection, WSPRC).

TOWNSHIP 28 N. R. 45a. 46E. W. M.
SPOKANE COUNTY WASH.

METSKER. MAPS



Comments: I ask you to please consider the huge loss of our largest stand of old growth forest in Spokane we would experience if the ski expansion goes forward. Too many times I have seen valuable flora and fauna lose to the almighty dollar. If we allow this ski expansion development, we won't have another chance to save this kind of irreplaceable old growth forest and the wildlife that comes with it.

It is time to take a stand and place a piece fragile environment above the potential money it MIGHT bring to the area. Please consider the multiple negative impacts this development would bring. Is it really worth it?

Comments: Please accept these scoping Comments in the official record for the land reclassification for the EIS for the PASEA for Mt. Spokane State Park.

Please analyze details of all of the following issues listed in this letter. All the mitigation needs to assess the effectiveness, feasibility and expense of the mitigation:

All the concerns raised by WDFW from the past 10 years to the present regarding the flora and fauna of Mt. Spokane within the context of the biological significance of Mt. Spokane. WDFW are the managers of Washington's animal and plant life.

All the concerns raised by the DNR in the last 10 years about the biodiversity (habitat preservation) significance of Mt. Spokane. The Parks and Recreation Commission has a responsibility for protecting biodiversity in the state according to this report which should be analyzed in the EIS:

http://www.rco.wa.gov/documents/biodiversity/EXECSUMMARY_FINALcomplete.pdf.

All the failures noted in the Spokane County Hearing Examiner's Findings, Conclusion and Decision dated April 9, 2013 regarding the Timber Harvest Permit. Specifically please see this section: Consistency of Timber Harvest Application with Country Critical Areas Ordinance on page 22 starting with number 93.

The accuracy of the SE Group Report dated Oct. 2013 needs to be analyzed and the statements checked factually with real data that shows that the statements are truthful. This report is being used to justify the PASEA expansion and it is fair game for scoping. In particular:

Analyze the mandate of Mt. Spokane State Park to manage it "for the greatest benefit of all public users. Why does that appear to only be a winter recreation mandate? The potential expansion should be analyzed to find out if it would benefit on non-winter users. Pg. 3.

Prove with historical documents and maps that the original site of the first lift facilities, lodges, etc. were in the current PASEA. The implication in the SE Group report is that the claim that the above was true, is used for justification of expanding the ski area. Pg.3.

Specifically identify and justify the "new tools" that would enable park rangers "to protect park resources."Pg.4

There is no discussion of wildlife, or old growth specifically in this report, even though it's well documented in the WDFW, DNR letters, and HE's Findings.

Show with data that "increasing the quantity and quality of intermediate level ski runs at Mount Spokane will also create a more even distribution of skiers at Mount Spokane." Pg. 5.

Analyze the potential of increased backcountry skiing in the PASEA.

Predicted climate change relative to the assumption that more terrain will provide more snow accumulation needs to have data to back it up. You need to have data showing the levels of snow accumulation on Mt. Spokane taken at the same elevation everywhere on the mountain in order to verify what is claimed is true. Pg. 6

Analyze the potential for the underutilized north side chair, chair four, especially within the context of global climate change. Show with data the "need for additional northerly facing terrain". Pg. 6. Show some data that the northerly slopes are "generally more protected from wind than other portions of the ski areas. As a result, there is generally more snow and higher quality snow in the PASEA area." Page 6. Where is some science behind all these claims?

Analyze the impacts on global climate change that may potentially make the ski area expansion a financial bust. This is a state park, and tax payers need to be taken into consideration.

Prove with data that "emergency response to lost and injured skiers within the PASEA on almost a weekly basis" occurs, and how it "taxes the resources of its all- volunteer ski patrol." The National Ski Patrol should have this kind of data, and even if they didn't it would be valuable to know this for the operation of a ski area whether it did or did not expand.

Analyze how expansion will practice "environmental stewardship in all aspects of its development and operational activities." Pg. 7. Analyze how you can mitigate never logged before old growth.

Analyze why a Concessionaires' Plan was never done and should be a part of an EIS. All of the above indicates that one should be written.

Analyze the existing ski and snowboard area within the context of upgrades and different marketing strategies. Analyze how it can be its own niche and not necessarily have to keep up with other ski areas to "succeed." Analyze if the the potential expansion will become obsolete if some of the other ski areas expand their skiing areas too.

The Washington State Parks and Recreation Commission has a mission, vision and core values that presumably they consider important and put into practice in the state parks. Analyze those three elements within the context of the ski expansion. By expanding are they meeting stewardship preservation into perpetuity, are they providing access to recreation, education, artistic and cultural oportunities, are they connecting the citizens of this state with their natural and cultural heritage and recreation and education experiences? How is this being done on Mt. Spokane when an expanded ski area will only benefit winter users? Are they doing the greatest amount of good with the least amount of negative impact on Mt. Spokane by expanding the ski area?

Meanwhile, the Parks Commission (by their mission and by their responsibility as a state agency) cannot forget about the SEPA mandate to protect the environment for the next generations as a trustee. That needs to be analyzed, that is, how will expanding the ski area promote the SEPA statutes?

If there will be night skiing with lights, analyze the effects on nocturnal and crepuscular animals.

Analyze the impacts that expanding into the old growth forest will have on the movement of animals throughout the county to Antoine Peak, Dishman Hills, Turnbull, etc. Will it put more pressure on those natural ares because of reduced habitat and human presence from an expanded ski area?

Analyze all the known data on Grilloblatta known to exist on Mount Spokane to determine negative effects of the ski expansion on this population of animals.

Analyze the benefits of having WDFW biologist help write the EIS.

I support a no-alternative action and request the PASEA be officially designated as a Natural Forest Area. The EIS needs to be carefully done considering the controversy of this possible expansion into the PASEA. The fact that it's a taxpayer supported state public park; the fact that MS2000 had its Timber Harvest Permit appealed and overturned; and that the Parks Commission's refusal to do an EIS for its "conceptual" expansion on Mt. Spokane was struck down in the Division 2 Court of Appeals. Those were serious legal errors, and this is a serious matter that should not be taken lightly.

Please feel free to contact me with any questions. Thank you for this opportunity to Comments.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed

Comments: Any decision by Washington State Parks & Recreation Commission must consider the current unique backcountry experience available on the west side of mount spokane. There really is no need for more of the same developed terrain on our mountain. I love mount spokane as is. Please leave the west side undeveloped and wild.

Comments: I spent the last 20 years skiing this great community hill with my kids who grew to love winter outdoor activities more than any videogame. The close attachment of time on lifts with teens helped them grow to very productive problem free adults. This also gave them the skills to remain active as slim fit adults, unlike many team sports teens play. We, like many others, skied the back of the hill lots; hiking up to lift 4-this is not untracked wildlife area, especially being bounded by snowmobile trails. This wonderful local resource for affordable family winter sports offers a unique community experience almost unheard of in skiing-not a costly commercial enterprise available only to the well-off. The efforts to preserve the viability of this accessible, affordable enterprise deserve support. Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: I am writing to express concern about the proposed expansion of the ski area on Mt. Spokane. The stand of forest which would be affected is far more unique than any man-made recreational facility could possibly be. Once destroyed, it cannot be regrown; once subsumed to the needs of the few, the needs of the many cannot be met.

The many who depend on this area include not only humans who need the outdoors and to know that such a large stand of native, old growth forest still remains in our county but also the plants and animals that depend on this stand for survival. The loss of this area is not something that could be compensated for or mitigated by planting a few trees or creating a park some place else.

I strongly urge you to perform an Environmental Impact Statement that is broad in scope and considers all aspects of what a change such as this would mean, both now and in the far-reaching future.

Comments: I do not know all the details of the proposed development of the Mt Spokane Ski area but I am aware that not all the studies of the impact have been completed. As a skier and a hiker at Mt

Spokane, I request that analysis considers all aspects of this proposal including work on existing ski areas. It appears that the initial work is coming from the people who most stand to profit from this. The Ecosystem in the proposed area is pristine, one of the last areas in our state parks and should be considered for saving for future generations. Once the environment is damaged, it can never be put back into place.

Comments: I'd like to take a moment to voice my opposition to the Mt. Spokane Ski expansion. I live in Spokane and frequently visit Mt Spokane State Park to bike and hike in the summer and to snow shoe and back country ski in the winter. I specifically use the area of the proposed ski expansion and am concerned that my ability to enjoy the park will be greatly diminished if the ski resort expansion is allowed to progress. Additionally, I have concerns about the destruction of natural habitat and the marring of the landscape. The great costs associated with this ski resort expansion will bring our community nothing more than a few more acres of marginal lift accessed skiing. In a community already fortunate enough to have many ski resorts within a reasonable drive, this trade off just doesn't make sense.

I would like to respectfully ask that we carefully consider the entire impact of this ski resort expansion to our community and future generations.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed. It is in a Park that was domated for recreation and there is no true old growth anywhere.

Comments: December 12, 2013 Spokane Ski Racing Association (SSRA), incorporated as Mount Spokane Alpine Team, is a non-profit 501c3 organization that has operated on Mt. Spokane since the late 1950s. From humble beginnings, SSRA has grown and developed into the best childrens alpine ski racing program in the Inland Northwest, as well as one of the best in the entire Pacific Northwest. Membership has grown to over 100 athletes, ages 5-18, and their families; more than doubling in size since 1997. The mission of the Spokane Ski Racing Association is to provide opportunities for young skiers to participate and compete in alpine ski racing. SSRA embodies fun, safety, participation, skill development, and competition. Training programs are designed to reflect these goals while striving for excellence. Being a member of SSRA insures an athlete the opportunity to achieve greatness in ski racing, while becoming an expert, all-mountain skier. However, SSRA is equally committed to nurturing positive attributes and life skills through alpine winter sport. Athletic fitness, individual responsibility and positive self-image are important aptitudes developed within SSRA programs. SSRA has set growth goals for the future that amplify its priority of making ski racing accessible and inclusive to the diverse population of the Spokane area. For instance, athlete tuition accounts for only 60-65% of operating expenses, annually. The remaining 35-40% of operating expenses is provided through membership fundraising events, corporate sponsorship, and hosting events for kids in the Spokane area and the entire region. This subsidization lowers program fees and makes participation possible for a wide population of young people in Spokane. In addition, a need-based scholarship fund was created in February, 2006 to assist families that could not otherwise participate in SSRA. With this commitment to Spokane and the customers of Mt. Spokane Ski and Snowboard Park, and a purpose based in the health and development of young people; SSRAs growth will undoubtedly mirror that of the Spokane area, as well as, the skier visits of Mt. Spokane Ski and Snowboard Park. To accommodate this growth; additional parking, lodge space, lift capacity, and ski trail acreage is needed. And, for that reason, amongst others, SSRA wholeheartedly endorses the current proposals regarding expansion of the alpine ski area, within Mt. Spokane State Park. Below are some of the most important reasons to expand into the PASEA for the health and safety of children and families of SSRA and the greater Spokane area: Safe Ski Trail Densities and Appropriate Progression of Terrain With the demand for snow sports projected to grow with the increase in population, ski area operators

must size and invest in their facilities to ensure adequate capacity for safe and comfortable skiing and snowboarding. Mt. Spokane's peak attendance in the next decade is projected to be significantly greater than peak attendance witnessed in the 1980s and 1990s, largely because of Spokane, Washington's sustained population growth and because a growing number of Mt. Spokane's guests are choosing to focus the majority of their skiing and snowboarding on weekends during the months of January and February. As a result, it is vital that Mt. Spokane be allowed to expand so the facility is able to provide safe and uncongested ski trails - especially during periods of peak attendance when Mt. Spokane's guest population is comprised by individuals with limited ski and snowboard skills. In specific regard to Spokane Ski Racing Association, kids need more terrain than is currently available at Mt. Spokane. The current intermediate terrain is congested and often dangerous. The area desperately needs more runs cut to bridge the gap between beginner and expert terrain. Furthermore, Mt. Spokane often experiences low clouds (yes, fog) like some other areas of the Inland Northwest. This results in a further concentration of skiers on a portion of the runs. This is especially the case on the backside chair 4 runs. These runs on the Northwest side of the mountain seem to experience far less fog than the front side. Cutting runs in the PASEA (also North facing) provides more terrain that sees far less limited visibility conditions. Long-term Economic Sustainability SSRA is pleased to see the Washington State Parks & Recreation Commission and the ski

area managers address a key deficiency in Mt. Spokane's existing ski facility. As currently configured, the Mt. Spokane operation is utterly reliant upon south-facing slopes. In most winters, Mt. Spokane's deep snowpacks weather the highly erosive elements of south-facing slopes - solar exposure and wind - without detriment to its operation. However, as the region-wide drought illustrated during the winter of 2004-2005, ski facilities with south-facing aspects are especially susceptible to dramatic reductions in their operating season (e.g., Mt. Spokane had a 29-day 'fiscal year' during the winter of 2004-2005). Expansion into terrain with a northern aspect will not only yield a very high quality recreational experience, and better, overall snow quality, it will help add resilience to the financial performance of the ski area. During years of modest natural snowfall, north-facing slopes will enjoy deeper snowpacks and will allow Mt. Spokane to open earlier in the winter and help the facility operate later into the ski season. Specific to Spokane Ski Racing Association, North slopes mean earlier and better training for the kids, and a more reliable means to deliver the healthy athletic pursuits of alpine skiing disciplines. Perhaps even more importantly, Mt. Spokane and SSRA competes with other areas, all of which have expanded terrain and lifts within the last 10 years. Like any business, Mt. Spokane must provide improved facilities, runs, and lifts. This can only occur and be sustained, with the additional expansion area utilized. We want to keep Spokane children of diverse economic means participating in the sport. This goal is most easily realized at close, affordable, Mt. Spokane. If Mt. Spokane cannot expand its operation and current boundaries, it will be extremely challenged to compete. If it cannot compete in the long term, our children will be the victims. Thank you for your time as it is an investment in the young people of the Spokane area and the Inland Northwest! We love Mt. Spokane and consider it one of the most special place on earth. Please help the families and children of SSRA and Mt. Spokane experience a safe and successful future. Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed. It's not fair that a few people with their last minute legal challenges can frustrate the public.

Comments: Mt. Spokane 2000's proposal for expansion of the downhill concession area, including placement of a new chairlift, should be rejected for the greater good, for the greatest number of people. I previously wrote a letter in response to Mt. Spokane 2000's original proposal in 2011: everything in that letter stands, thus I am providing it as Comments for the final decision to be made.

Comments: I am an avid, long-time Mt. Spokane skier, and strongly oppose the proposed expansion by

Mt. Spokane 2000 into the west-side old-growth forest and wetland habitat. It is of utmost importance that the west-side area below the summit of Mt. Spokane be permanently designated a natural forest area.

I speak from several decades of experience recreating on the mountain and in this great resource of a park. I recreate on Mt. Spokane at least 30 days per year doing the following:

1. Downhill skiing--riding the chairs and skiing in the downhill ski area both days and nights
2. Backcountry skiing--skinning up, touring, and skiing back down outside the downhill property
3. Cross-country skiing--on the groomed cross-country trails
4. Mountain biking—on existing roads and appropriate single-track trails
5. Hiking & climbing
6. Road biking
7. Search and rescue--including training and missions

My recreational experiences, which include skiing, hiking, and biking, will be severely negatively affected if Mt. Spokane 2000 is allowed to expand into the west side of Mt. Spokane.

I am particularly concerned by the dissemination of false information by, and the political influence of, Mt. Spokane 2000 in their strong, multi-faceted publicity campaign to change the designation to allow them to ruin this area by cutting in roads and logging this area. Many of the points below are in response to Mt. Spokane 2000's "Proposed Backside Expansion" page at <http://www.mtspokane.com/107/backside-expansion/>.

1. Historical precedent of land use in the PASEA: The west-side area below the summit was originally saved from logging and protected as a natural reserve in the 1930s, by numerous people and groups including Cheney Cowles and the Spokane Mountaineers (ref: http://www.historylink.org/index.cfm?DisplayPage=output.cfm&file_id=7819). This is the historical legacy of the PASEA, not that a family of influence is entitled to change the designation of this area because their forebears generously donated property to Mt. Spokane State Park. The PASEA area was not "historically developed" for skiing as Mt. Spokane 2000 claims; rather, it was historically protected from development including logging.

2. Not a compromise: Cutting up the 279 acres within the 800-acre area will ruin the entire 800-acre area and surrounding acreage as it currently exists: as unique, pristine sub-alpine altitude habitat and a viable, intact ecosystem tied into the rest of the mountain, unlike any other habitat in and outside Mt. Spokane State Park. Please heed the recommendations of Washington State Fish & Wildlife, the Department of Natural Resources, and many public organizations, and leave the PASEA intact as natural forest, wetlands, and meadows. Not only will the 800-acre ecosystem be ruined by making roads and clearing large swaths of trees and vegetation, the surrounding land—including the Blanchard Creek drainage—will be affected. If the expansion is allowed, the negative visual impact of the scarring of the west side will be obvious from the main transportation corridors north of Spokane along Highway 395 and Highway 2, as well as from northern Spokane County communities such as Deer Park.

3. Increased liability: Expansion of the Mt. Spokane 2000 concession into this area will NOT decrease liability for rescue, as Mt. Spokane 2000 claims, but rather would INCREASE it. I have great

respect for the Mt. Spokane Ski Patrol, but their recent mock rescue in the PASEA was a well-timed publicity stunt during the final days of Comments to help influence this issue (Bill Jennings article in the March 17 issue of the Spokesman-Review). Mt. Spokane 2000 claims that they rescue people “weekly” from this area (ref: <http://www.mtspokane.com/107/backside-expansion/>). This is entirely false. Ski Patrol rescues from this area are rare, and I challenge Mt. Spokane 2000 to provide truthful documentation for *any* rescues they’ve had in this area. However, I am a member of Spokane County Search & Rescue, and we have called out to search for lost skiers and boarders (and snowmobilers) in the following areas recently over the last 2 ski seasons:

a. to the south of Mt. Spokane, including on and around Mt. Kit Carson

b. to the west and north of Mt. Spokane, in the North Blanchard Creek drainage c. to the northeast in the Brickel Creek drainage In short, skiers and boarders venture out of the boundary area all over the mountain, especially on the south side and down toward Mt. Kit Carson pass. This doesn’t mean that Mt. Spokane 2000 should expand into this and other areas as well. If there is an expansion into the westside with a lift and runs, more skiers and boarders will be riding in this area, and there will be an even greater attraction to ski outside what will be the new boundary further down the west slopes. As it is now, the westside PASEA area is not attractive to the vast majority of skiers and boarders.

Every ski resort (including Silver, Schweitzer, 49 Degrees North, and Lookout, and beyond) has boundaries to patrol up to, and, realistically, will continue to have to search-and-rescue out-of-bounds skiers and boarders. Prevention consists of education, clearly marking the boundaries with rope and signs, and even managing it as some resorts do such as Schweitzer Mountain. One of the main reasons I helped to found a volunteer backcountry search and rescue team (Inland Northwest Search & Rescue, originally the Spokane Mountaineers Search & Rescue) was knowing of the need to assist the Mt. Spokane ski patrol to search in the winter for out-of-bounds riders.

4. Claim of historical use of a chair lift in the PASEA is false: Mt. Spokane 2000 claims that they would be “re-installing” a chair lift in the middle of the PASEA area. There was never a chair lift in the middle of the PASEA area as Mt. Spokane claims; however, there was a rope tow called the “Selkirk Tow” that existed in the late 1940s. This rope tow went to the summit, and was placed on the southwest side, adjacent to the trees and the “bald” area on the southwest side of the mountain (ref: “Purchasing a Mountain, Clyde Stricker, 1975). According to 2 different sources (including Stricker), the length of the tow was either 900 feet or 1400 feet long (not vertical elevation, but the length of the rope tow). The first chair on the mountain, the first double chair lift in the world, was designed by Riblet of Spokane, and was a wood chair. Placed on the east side of the mountain, it was used for 3 winter seasons, and operated from 1946 to 1949. Today’s chair #1, also a Riblet chair and placed for use first in 1955, is located on the east side not far from where the old wood chair was located (source: “Purchasing a Mountain,” Stricker).

5. Claim that the resort is “utterly reliant upon south-facing slopes” is false: According to Mt. Spokane 2000, in their Board of Directors letter to “the friends of Mt. Spokane Ski & Snowboard Park:” “As currently configured, the Mt. Spokane operation is utterly reliant upon south-facing slopes” (Ref: <http://www.mtspokane.com/107/backside-expansion/>). Most of the concession area is NOT on the south side, it is on the east and north slopes of the mountain! The south side slopes of the mountain are actually outside the Mt. Spokane 2000 concession boundaries. This is easily discernible merely by looking at a map. The north and east slopes generally hold the best snow on the mountain (please see #6 below).

6. Claim that the west side snow is “better” and more abundant according to Brad McQuarrie, is false: The snow on the west side of Mt. Spokane is not “better,” nor is there more snow on the west side as claimed by Mt. Spokane 2000 Manager Brad McQuarrie in a recent Spokesman-Review front-page article (March 14). Snow conditions are variable and change all the time, but most storms come from the southwest, and because of this, prevailing winds generally deposit more snow on the north and east slopes of the mountain—where the concession exists. If the westside area is logged and runs put in and a chair installed, it is certain that generally less snow will exist on the west side as prevailing winds, with the lack of forest and brush cover, will carry more snow over the summit and re-deposit it on the north and east slopes.

7. Claim that west side expansion will allow a longer ski season is false: Mt. Spokane 2000 has claimed they will be able to open the mountain earlier, and keep the mountain open longer in the spring, if they expand onto the west side. As mentioned in the point immediately above, there is NOT more snow on the west side—especially such that it would facilitate an earlier opening day. As far as closing dates are concerned, Mt. Spokane 2000, up until last year’s 2009-2010 season, regularly closed the first weekend of April, fully one week before the other 4 Inland Northwest regional resorts. This is more due to the declining interest in skiing during springtime, as more people are participating in warmer weather activities in the valleys. Mt. Spokane 2000 felt it wasn’t economically feasible to keep their resort open during this time. Another major reason for their early closure is that nearby resort 49 Degrees North allows free skiing to all during their last 7 days of seasonal operation, from Monday to Sunday, during the week of spring break for many Spokane-area schools (source: <http://www.mtspokane.com/news/19/closed-for-the-2008-2009-season/>). I ski myself on the slopes of Mt. Spokane after the concession closes, typically through the end of April, many years through the month of May, and some years (such as two seasons ago), into June.

8. Mt. Spokane claims a need for more intermediate terrain: The vast majority of the terrain on the mountain is already “intermediate.” The reason there are more people on the northeast side of the mountain and the cat track that runs to the main lodge (lower “Northwest Passage” and the “Cat Track” trails, ref: “Backside Expansion” Mt. Spokane 2000 letter: <http://www.mtspokane.com/107/backside-expansion/>) has more to do with the existing layout of chairs and runs—more can be done to spread people out in this existing large concession area without expanding onto the west side. This will always be an area of congestion the way these trails, and those around them, are currently designed.

9. Claim that the economic viability of the mountain will be enhanced by expanding onto the west side is false: People come to ski and ride on Mt. Spokane in greatest part because it is closer to Spokane, it costs less than other resorts, and it offers night skiing. Mt. Spokane 2000—as a non-profit group—is at an advantage compared to the for-profit resorts, for many reasons. Additionally, Mt. Spokane 2000 is the main beneficiary of projects paid for by state taxpayers, a luxury not afforded by for-profit ski concessionaires. More people are interested in having the existing, aging facilities upgraded—in particular the 5 historical 2- person, slow-moving Riblet chair lifts, and the 2 aged lodges. This, along with improving terrain for skiing within the existing concession boundaries, will attract more skiers and boarders, thus bringing increased revenue and employment. This should be the priority of Mt. Spokane 2000, without question.

10. Recreational opportunities will be worsened, not enhanced, by a potential westside area expansion: I am an avid recreationist and longtime lover of Mt. Spokane. I enjoy having not only the opportunity to ski in the regular downhill concession area as an alpine skier, and as a cross-country skier on the well-groomed miles of cross-country trails, but especially as a backcountry skier in the fewer instances I venture into the westside area below the summit of Mt. Spokane. This I generally do on days and evenings once the downhill concession is closed. Once the snow has melted, I also hike and

mountain bike all over the mountain, including in the westside area and on the existing roads and trails that surround it. I recognize the westside area as unique subalpine habitat with old-growth trees, wetlands, small meadows, and areas of dense growth vital as habitat for a great variety of animals from birds to large mammals, through winter and summer. This habitat, and my experience of it, will be destroyed if Mt. Spokane 2000's request for expansion is approved. It's very logical that myself, as well as the many members of the Spokane Mountaineers—a recreation club that promotes recreation first—recognizes the value of this habitat for it to remain as it is.

I thank you for your consideration, and trust you to make the best decision that will allow Mt. Spokane to remain a shining jewel of the greater Spokane area, that will be the best for the future of the park, and the greatest benefit to the people who experience it now and in the long-term future.

Sincerely,
Spokane Mountaineers Librarian
Inland Northwest Search and Rescue member

Comments: The WA Park Dept is going to incur liability exposure if it approves such a detrimental development of the sensitive area targeted by the blindly aggressive and shortsighted concession management.

Comments: We ask that you please carefully consider the following concerns of the expansion of skiing terrain at Mt. Spokane Ski Hill. Our family has been Mt. Spokane season ticket holders for the past 10 years. Our three children learned to ski there, and developed their passion for skiing. We have enjoyed and appreciated the mountain for its downhill and cross country skiing, snowshoeing, hiking, school field trips, back country skiing (off the back side) as it exists today; Mt Spokane has truly enriched our lives .

Mt. Spokane State Park is well utilized if not over utilized (to the detriment of our environment and much needed old growth vegetation and wildlife habitat), specifically including but not limited to downhill skiing, tubing, snow mobiles, cross country skiing, snow shoeing, hiking, mountain biking, berry picking, sightseeing, condominium access etc.). The expansion proposal ultimately will eliminate what we have left as part of a vital and critical eco-system for the entire region including both Idaho and Washington.

As you look at this valuable resource and consider the expansion plan consider this... this is not simply a hoop to jump through for expansion, but an opportunity to be a leader and model in our community and state for preservation, sustainability and protection of diminishing resources. Once gone these cannot be reclaimed, that is why we urge a whole picture evaluation.

We oppose this expansion for four specific reasons:

1. With the existing ski area there is room for improvement on the mountain and with the runs. Becoming more effective and efficient before any expansion is approved. Asking the question, is the existing ski hill and utilization of the resources on the mountain truly developed to it its fullest potential and if not, what else could be done to make what is there currently more efficient attractive?
2. Considering the above reason...Environmentally, if people regularly put a grain of sand in a glass eventually it will fill up. What then? Is it too late? We depend on our state officials to understand this concept applying it to this critical watershed and environmental space.

3. Realizing economics is important, when is enough, enough with a mountain that is wonderful and on the brink of over utilization.
4. A major draw to the area is the old growth forest and the wildness of the area. development as proposed puts this priceless resource at risk and in turn potentially harms the very gifts we currently enjoy.

Comments: I support the Comments that any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed. I'd also like to respond to the theory that "enough chair lifts and runs" already exist in the Inland NW skiing market. While its true we have and have gained many additional facilities over recent decades, the Inland NW represents one of the greatest ski destinations in all of the Pacific NW and certainly Washington State. It is a significant economic driver, source of positive outdoor recreation, and introduces the general public to "public lands" in creative ways. Mt. Spokane and its amenities offers the most unique and special outdoors experience which continue to grow and evolve - which includes this proposed expansion. As a skier, hiker, biker, snowshoer and long-term proponent of public lands I fully support this proposal. Its benefits far outweigh any negatives from a sustainability perspective.

Washington State Parks
P.O. Box 42650
Olympia, WA 98504-2650

December 12, 2013

Subject: Mt. Spokane State Park, PASEA Land Classification EIS

Dear Mr. Kline;

Washington State Parks should consider the possibility of managing the west side of Mt. Spokane (PASEA) as a controlled backcountry area that would be operated as a part of the Mt. Spokane Ski Area. The west face of Mt. Spokane has been used by backcountry skiers and snowboarders for many years. These people climb to the summit of the mountain using snowshoes and climbing skins to enjoy the area and do not use chair lifts. In fact, climbing is one of the reasons many of them enjoy the sports. The west face of the mountain is the closest backcountry area for skiers and snowboarders who live in Spokane County. It is used by beginner backcountry skiers and snowboarders including members of the Spokane Mountaineers for teaching and training. The west side glades, located on the mountain's west face, are natural ski lines that can hold excellent powder snow for winter recreation.

The proposed expansion of Mt. Spokane Ski Area will eliminate the possibility for backcountry skiers and snowboarders to enjoy the area. Also, the proposed development of the PASEA is highly controversial because of the irreversible destruction of subalpine old growth forest and associated wildlife habitat, as well as hydrologic implications and impacts to the viewscape of northern Spokane County.

There is an alternative that I believe Washington State Parks has not thoroughly considered up to this point. This would be the creation of a designated backcountry area to be integrated into Mt. Spokane Ski Area operations. The land classification choice is where Washington State Parks is making the critical decision. The Natural Forest Area classification may be too restrictive to allow for creation of a managed designated backcountry area. The Land Classification Management Guidelines state that for Natural Forest Areas; *"Hiking, non-groomed cross-country skiing, snowshoeing, or other trail uses of similar impact to natural systems and providing a compatible recreational opportunity, may be permitted, after consultation with appropriate local, state, federal and tribal resource management agencies, and upon a finding by the agency that such trails are not likely to significantly degrade natural forest processes."* The classification of the PASEA as a Recreation Area is too open ended, and gives MS 2000 the impression that they have been given the go ahead to begin developing the area with ski runs and a chair lift. I do not support this designation.

The classification of Resource Recreation Area is perhaps the best match for creation of a managed backcountry area. According to the Washington State Parks definition (WAC 352-16-020), Resource

Recreation Areas, “are suited and/or developed for natural and/or cultural resource-based medium and low intensity outdoor recreational use.” Should the PASEA be designated as a Resource Recreation Area, alpine ski facilities would not be an allowed conditional use while backcountry snowboarding and skiing would be allowed.

A designated backcountry area on the west face of Mt. Spokane can be created in the following ways:

- No Chair lift is needed on the west side (PASEA).
- No grooming would occur on the west side (PASEA) except for the west side road (Trail 130).
- Minimal thinning of the natural forest area other than to drop hanging downed timber for skier safety and thinning of trees less than say 2.5 inches in diameter.
- Grade the west side road (Trail 130) so that gravity will allow skiers to return to the lower terminus of Chair 4 on the north side of the ski area.
- Require skiers and snowboarders who enter this backcountry area to have a buddy when entering (or be required to pass through a beacon check station and carry avalanche rescue equipment).
- The ski area would patrol this controlled area.
- Trail 130 would be marked to prevent skiers and snowboarders from skiing beyond the patrolled area.
- The ski area would charge users of the backcountry area who use the front side ski lifts the normal fee.
- Backcountry skiers who choose to climb from the base of the backcountry area would be allowed to do so on or outside the south edge of the backcountry area. Skiers and snowboarders who use the backcountry area, and do not ride the front side chairs, may be charged a nominal fee for entering and using the controlled area.

Creation of such a backcountry area would allow for the following:

- Help to distinguish it from other ski areas in the region.
- Glading would occur in such a way that it would not be visible from the Little Spokane River basin and other areas in northern Spokane County.
- Retention of the old growth forest on the west face of Mt. Spokane, while enhancing the forest’s ability to tolerate fire and disease, as well as enhancing the area for wildlife habitat especially in the summer.

Backcountry skiing and snowboarding are extremely popular winter sports and growing exponentially! Many skiers and snowboarders crave the opportunity to ski ungroomed powder in a backcountry setting. The snow retention on the west side of Mt. Spokane would be enhanced by the presence of this type of “minimal glading”.

One of the arguments that MS 2000 has put forth to support their proposed expansion is that the “ski season” would be lengthened by developing Mt. Spokane’s west face. However, most resort skiers and

snowboarders consider the season to be over around the third or fourth week of March; a time of the year when there is often the deepest snowpack at higher elevations. Therefore adding a chair will make no difference in lengthening the “ski season”, especially on west facing aspects which would tend to melt out quickly in the spring if ski runs are cut as proposed by MS 2000.

Mount Spokane ski patrol can control skier access to the Blanchard Creek drainage by roping off the west shoulder of Trail 130. This type of controlled/patrolled backcountry area will retain snow better, thus enhancing hydrologic storage within the headwaters of Blanchard Creek while at the same time allowing the west face of Mt. Spokane to be enjoyed during the winter with a low skier density controlled backcountry experience that are highly sought after in modern skiing and snowboarding.

Creation and operation of this controlled backcountry area could be done in an “experimental” way with minimal effort and without development, cutting ski runs or installing a chair lift. My suggestion would be a minimal trial period of five years, which would allow the ski area to focus fiscal resources on improvements to the infrastructure on the front side of the mountain.

The creation of such a backcountry area would enhance the ability of Mt. Spokane State Park to fulfill Washington State Parks’ mission of “...*connecting all Washingtonians [emphasis added] to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives.*”

I believe that designation of the PASEA as a Resource Recreation Area and allowing for the creation of a managed backcountry ski and snowboard area would be a compromise that would protect the areas unique natural qualities and cultivate recreational opportunities, creating something that almost everyone can appreciate and enjoy, year around in perpetuity. Such a decision would provide appropriate management and preservation for this unique area in Spokane County, Washington, and the Inland Northwest.

Respectfully submitted, John

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Randy Kline, Environmental Program Manager
Washington State Parks and Recreation Commission
1111 Israel Road SW
Olympia, WA 98504-2650

December 12, 2013

RE: Comments on EIS Scoping for MSSP Proposed PASEA Expansion

Dear Mr. Kline,

The Spokane Mountaineers have a particular interest in Mt Spokane State Park including owning land in the Park, operating one of the first rope tows on Mt Spokane and continuing to support through volunteer efforts and other ways the many recreational opportunities. The Club is based in Spokane and has about 800 members.

The Club is one of the founders of the Save Mt Spokane Coalition – that includes a broad range of recreation and conservation groups. The Spokane Mountaineers Conservation Committee has followed and Commented on the proposed expansion into the PASEA for many years. The following has been endorsed by the Conservation Committee.

1. We request the EIS be based on a long-range plan for the Mt Spokane Ski Area in the PASEA. The environmental impacts will vary greatly depending on the ultimate development in the PASEA. We request a Master Concession Plan be the basis for the environmental assessment of the land use classification in the PASEA or at the very least the assumption is made for full development that would be allowed under the land use classifications proposed. An evaluation that does not consider the cumulative effects will underestimate the adverse effects. Merely considering the current proposal is not sufficient. Additional buildings, lodges, roads, lighting, runs, lifts and glading in-between the runs should be evaluated as part of the current project.

An alternative to evaluate whether improvements to the existing impacted ski area including additional runs, chairs and modifications to improve the ski experience would be forthcoming from the long-range Concession Plan.

2. We request the EIS should include a comprehensive review and evaluation of the Spokane Critical Areas Ordinance to determine the required mitigation and impact compensation. There continues to be untrue challenges to the quality of the undisturbed subalpine forest ecosystem that will be affected. All of the expert opinions including the DNR, the WDFW and the Pacific Biodiversity Institute's Biological Survey conclude the ecosystem is



almost unaffected by development or logging. We urge full consideration of the many issues raised by the WDFW and DNR. In addition, the Spokane County Hearing Examiner that rejected the logging permit in 2013 found gross errors in the ecological assessment and proposed mitigation. We request a careful review of the issues identified in the Hearing Examiner's decision.

3. Please describe in detail the plan for monitoring and enforcement of the many mitigation steps required for the proposed project. Given much of the work is likely to be completed by volunteers, is compliance possible? Who pays for the cost of the compliance monitoring? Given the degraded quality of the existing impacted ski area, there appears to be a lack of following required Best Management Practices to limit erosion and revegetation. The new addition to Lodge 2 was completed in 2012 and still shows exposed, heavily eroded slopes with no apparent efforts to revegetate or mitigate erosion.
4. Please specifically consider the DNR recommendation to include the entire PASEA in the Blanchard Creek Natural Forest Area as an Alternative. As part of this Natural Forest alternative, please consider the value of current and further enhancement of year-round recreation and nature study in the PASEA. The hiking, gathering, mountain biking, backcountry skiing and snowshoeing in the PASEA is excellent and will be downgraded significantly by the proposed project. There are no suitable alternatives within two hours drive for the subalpine nature study for students and youth. There are no suitable alternatives within two hours for backcountry skiing and snowshoeing. There are already sufficient downhill ski opportunities in the Inland Northwest.

The best use for the PASEA is to continue the non-motorized recreation and outdoor education already there. The construction of the ski runs and lift will ruin the four-season use of this area. All outdoor recreation surveys show hiking and short walks the entire family can enjoy have by far the highest rate of use. Alpine skiing, backcountry skiing and snowmobiling have far less use at about 1 to 2 percent of the population. All recreation users should have their space to enjoy their activity but the PASEA, using trail 135 and the loop fire road, will provide the best recreation access for hikers, snowshoers, and horsemen. A land classification of Natural Forest Area will be a good match for the sensitive natural conditions in the PASEA and serve an important part of the recreation community.

The PASEA is the best opportunity for the most popular recreation and the best opportunity for outdoor recreation. State Parks has had a program to encourage "No Child left Inside". The facilities at Mt Spokane for outdoor education are poor. The PASEA has several advantages including a paved road to the access, nearby buildings for shelter (Vista House and the CCC Cabin.) The most important PASEA characteristic for outdoor education is a short walk will take the students through a wide variety of habitat including



wetlands, meadows, and a variety of forests including old growth. This allows day trips from Spokane to serve the students.

The Biological Survey shows ecological conditions that are perfect for study and learning. We expect the Save Mt Spokane Coalition to continue to work on environmental learning and outdoor education opportunities in Mt Spokane State Park.

5. Consider the effects of global climate change on the viability of the Mt Spokane Ski Area. The natural forest characteristics can't be replaced if current trends in climate change cause snowfall at Mt. Spokane to be inadequate to support the ski area.
6. Consider skier visits will increase significantly on a permanent basis considering the competition, climate change, and increasing lift ticket prices. Will there be enough additional skier visits and revenues to make up for the loss of the forest values in the PASEA. If the national trend for flat skier visits continues, the analysis is likely to find only a short-term increase in skier visits from the expansion.
7. Document the expected revenues to the State Parks from the increased skier visits. Projections are notoriously optimistic – the projections for Discover Pass revenue was over twice as high as the actual revenues. In this case, the cost might be an irreplaceable forest ecosystem. Please be realistic and weigh the revenue increase against the loss of the pristine forest ecosystem in the PASEA. Given the millions spent on protecting conservation land in Washington State including \$90 Million on the Teanaway Watershed, the \$65 Million in the current biennium on the Washington Wildlife and Recreation Program, and the \$2 Million per year on County Conservation Futures, protecting the nearly perfect west side forest that is already in State Parks ownership is the prudent approach.
8. Please evaluate the effects of the grading and soil disturbance as part of the project. The proposed project involves more than the ski lift and runs. Roads will need to be built for access to the equipment and also for ski area maintenance equipment and grooming machines. Evaluate the landslide potential. Landslides are common on the disturbed slopes on the north, east and south sides. Landslides have occurred along the roadways in MSSP including but not limited to the massive landslide that torn out the Mt Spokane Road at the entrance. This landslide closed the Park for most of a season. Increased runoff from the clearing and grading may result in higher potential for landslides. In addition consider the silting and damage to fisheries from the increased sediment load.
9. Please evaluate the impact of the land use classifications on wildlife including goshawk, lynx, wolverine, gylloblatta and other wildlife that may be affected.



10. Consider the impact on the many native plant species not found elsewhere in MSSP. There are rich wetlands and springs in all areas of the PASEA. The Biological Survey conducted by Pacific Biodiversity Institute confirms the high value of the habitat in the Biological Survey Area. They state,

“There were no noxious weeds growing within the BSA.” p. 26.

“We identified 36 new vascular species that we had not found during previous years at Mt. Spokane State Park.” p. 17.

“Several of the plant associations are uncommon or possibly unique,” p. 54.

“there are significant areas of old-growth forest within the BSA.” P. 58

“Most of the polygons within the BSA contain streams, springs and small wetlands.” P. 58.
11. Please evaluate the long-term effect on old growth forest in the PASEA. Evaluate the effects from the ski run openings on the blow down rate of the trees to remain. Typically opening an intact forest results in severe blow down in the surrounding areas from increased wind load.
12. A quote from the Biological Surveys conducted in 2010 by Pacific Biodiversity Institute for Mt Spokane 2000 said,

“There are significant areas of old-growth forest within the BSA (Biological Survey Area). These forests provide habitat for wildlife species dependent on late-successional forest condition. Much of the rest of the forests within the BSA also have some old, large trees and are moving toward old-growth conditions. Nearly all the forest stands in the BSA have abundant large and small snags of various decay classes, providing abundant habitat for wildlife species that depend on snags for nesting, foraging and roosting.”
13. Evaluate the potential for increased fire risk from the logging and slash left behind. Cheney Cowles was the leader of the effort to protect the Mt Spokane forests writing,

“Preserving the timber is important, not only from the standpoint of retaining the beauty of the drive to the summit of the mountain, but also to forestall a serious fire hazard which would be the certain result of the slashings left by lumbering operations” Cheney Cowles, “Mt. Spokane -- To Be or Not To Be,” *The Northwest Conservationist*, January and March, 1939, pp. 5-6
14. Please an Alternative with full development of the existing ski area to the north, east and south should be evaluated. The PASEA would be left as is with alpine, backcountry and snowshoe use. With improvements for beginner and intermediate skiers, the Ski Area will be the first choice for families. The route down to Chair 3 and Chair 5 is currently unsafe because of the mix of expert, intermediate and beginner skiers. Ski racing teams can use the southeast face with modest improvements.



15. Consider an alternative without any Recreation land use in the PASEA. Use a mix of primarily Natural Forest land classification. All existing activities can continue. Skiers and boarders using the PASEA can use Chair 4 Road (Trail 130) to go to Chair 4. Make modest improvements to Chair 4 and Chair 4 road to allow skiers and boarders to return to the east side of the Ski Area. Chair 4 pickup terminal can be moved to a lower elevation to get out of the wetland. Chair 4 is the chair that extends to the north – so enhanced use of Chair 4 will have more benefits than the proposed new chair that extends to the west.

Thank you for the opportunity to Comments on the scoping. In conclusion, we request including alternatives that protect the PASEA and also an alternative that evaluates the environmental impact of limiting improvements to the existing affected areas on the north, east and south sides.

Sincerely,

Jeff Lambert
Conservation CoChair
Spokane
Mountaineers

Randy Kline
Environmental Program Coordinator
Washington Parks and Recreation Commission
1111 Israel Road S.W.
Olympia, WA 98504

December 12, 2013

RE: Comments on the scope of the Environmental Impact Statement for Mt. Spokane State Park

Mr. Kline,

I would like to Comments on the scope of the Mt Spokane Environmental Impact Statement.

Mt Spokane State Park is a very unique park and we in Spokane County are very fortunate to have such an excellent recreation and educational park so close to the metropolitan Spokane area. It is a treasure that I do not take for granted.

When determining the scope of the EIS, I would ask that you look at a few items.

- 1) A Master Concession Plan was to be a part of the MT Spokane Facility plan. I feel that this plan should be completed. Consideration needs to be made for the possible economic and social impacts of the proposed ski area expansion. The question needs to be asked - does it make economic sense and what are the tradeoffs if the expansion is done.
- 2) Mt Spokane contains the largest stand of old growth timber in Spokane County. This fact should not be ignored. The Spokane County Critical Areas Ordinance requires for the mitigation and compensation of impacts caused by development. The loss of this stand cannot be compensated or mitigated. Even if "just a few trees are removed to allow for a ski run" it will have a detrimental effect on the entire eco system.
- 3) All of the concerns raised by the Washington Fish and Wildlife and the US Fish and Wildlife need to be analyzed.
- 4) **I would support and want an analysis of a no- action alternative that will designate the PASEA area as a Natural Forest Forest.**

I am an avid downhill skier but do not support the expansion of the ski area into the PASEA. The trade off of losing the pristine forest is one reason but also the loss of a unique back county recreation area is not worth it. This area has many uses besides lift assisted downhill skiing. Backcountry skiing, snow shoeing, and hiking in the summer months are a few of the recreation opportunities that would be lost by the expansion.

Thank you for your consideration, Fred Oberdorfer
President Spokane Mountaineers Foundation

Comments: The Spokane Falls Chapter of Trout Unlimited (SFTU) wishes to comment on the Mt. Spokane PASEA Land Classification EIS scoping. Of the three land classifications being considered the Natural Forest classification is SFTU's preferred alternative. This classification provides the least potential impact on fish bearing waters downstream from the PASEA boundaries.

Our concern is that clear cutting to remove trees and vegetation for the proposed ski area will change the timing and characteristics of spring runoff and ground water recharge which can result in adverse impacts on spawning and rearing habitat for native redband trout in Blanchard Creek. We respectfully request that the EIS scope to determine the correct land classification take into consideration the potential impacts to native redband trout in Blanchard Creek and other Mt. Spokane watersheds.

Please find attached our comment letter from May 2012 as further support for our concerns. Thank you for the opportunity to participate in the public Comments portion of this proposal. We stand ready to continue to participate as the opportunities arise.

Sincerely,

Bill Abrahamse
President, Spokane Falls Chapter of Trout Unlimited
509-209-4048



May 28, 2012

Mr. Randy Kline
Environmental Program Manager
Washington State Parks and Recreation Commission
P.O. Box 42650
Olympia, WA 98504-2650

Dear Mr. Kline:

Thank you for the opportunity to Comments on the Draft Supplement Environmental Impact Statement (DSEIS) pertaining to the proposed ski area expansion with Mt. Spokane State Park.

Spokane Falls Chapter of Trout Unlimited is an organization of over 400 conservation minded anglers residing in Eastern Washington. Trout Unlimited's mission statement is to "conserve, protect and restore North America's coldwater fisheries and their watersheds". Our conservation platform specifically addresses the need to protect headwaters. Without intact headwater areas, trout that depend on cold, clean water cannot thrive. Mt. Spokane is such a headwaters area that we feel needs to be protected.

Our primary concern is that the DSEIS did not address possible post completion impact of the project downstream of the 279-acre expansion area identified. Neither were mitigation steps for possible impacts identified. The basis for our concern is as follows:

1. Soils prone to erosion - In section 3. Affected Environment and Environmental Consequences, subsection 3.1.1 the soils and geology of the project area were described as having "a severe to extreme erosion hazard".
2. Changes to runoff characteristics – In 3.1.3-Alternative 2 and in 3.1.4-Alternative 3, a statement was made that "With tree removal, there would be a reduction in water uptake, as well as an increase in the peak runoff and timing." Mitigation was offered however, the concern regarding the nature and timing of runoff still holds true. As we have seen in other headwaters, removing trees can cause the runoff to become flashier with higher volumes coming off over a shorter period of time. Flashy runoff can cause changes to erosion patterns with a resulting loss of fish spawning and rearing habitat downstream of the project area. In addition, the change to a runoff pattern with more coming off sooner may lead to higher temperatures and impacts on dissolved oxygen during the summer months.

3. Stream typing – in 3.2.2.1 the streams in the study area were identified as non-fish perennial. However, the study was done in October and did not consider whether or not trout use the streams for spawning which occurs in the spring. It is not uncommon for trout to migrate to headwaters to spawn and then move downstream as the water volume declines. The timing of the field surveys was inadequate for considering trout needs.

Without substantial steps to mitigate the potential damage to the headwaters as it applies to such fisheries, SFTU cannot support the ski area expansion. Possible steps address our concerns include the following:

1. Use the best available science to assure no loss of fish and riparian habitat within and downstream of the expansion area.
2. Perform an additional study in the spring to reassess the presence and abundance of native trout in the streams within and downstream from the expansion area. This study would also serve as the baseline for future comparisons.
3. Provide funding for monitoring the streams for 5 years after the project is complete to measure the changes to runoff patterns and the resulting impacts on fish and riparian habitat.
4. Provide funding to repair damages that are shown to be a result of the project.

We in Trout Unlimited strive for win-win outcomes. Our mission statement is not meant to impede development but rather to protect watersheds and clean water for all inhabitants. We earnestly look for watershed issues that may be misunderstood or ignored which means we sometimes have to take an unpopular position to bring light to situations. We wish to avert future problems that are not always considered until after serious consequences or repairs are necessary. It is for this reason we feel the DSEIS is not complete and we cannot support it in its present form.

Sincerely,

Bill Abrahamse
President, Spokane Falls Trout Unlimited

CONSERVATION BIOLOGY CENTER

919 S. Adams St., Spokane, WA, 99204, USA

509-835-5233

07 December 2013

Randy Kline, Environmental Program Manager

Washington State Parks and Recreation Commission

1111 Israel Road SW, Olympia WA 98504-2650

Phone: [\(360\) 902-8632](tel:(360)902-8632); FAX: [\(360\) 586-0207](tel:(360)586-0207); Email: randy.kline@parks.wa.gov

SUBJECT: Scoping of EIS for Mt Spokane Potential Alpine Ski Expansion Area (PASEA) Land Classification

Dear Mr. Kline,

- 1) It is our understanding that Washington State Parks and Recreation Commission is preparing an Environmental Impact Statement to consider and disclose anticipated environmental impacts related to formal land classification for the approximately 850 acre area known as the Potential Alpine Ski Expansion Area, and
- 2) WSP is requesting Commentss on the scope of this EIS.

We have been conducting research on the forest invertebrate fauna of Mt. Spokane State Park since 1994. We have documented that the resident fauna there includes some exceptionally remarkable species, including an undescribed spider species whose geographic distribution may be limited to Mt. Spokane (Dr. Rod Crawford, University of Washington – Burke Museum, Seattle).

Also there is a population of flightless ice crawlers (Insecta: *Grylloblatta* sp.) closely associated with the subalpine-fir forest near the summit on the west side where forest clearing and soil disturbance for a ski lift and ski runs has been proposed. This is the only known *Grylloblatta* population in eastern Washington east of the Cascades Mountains. There is a good chance that this ice crawler population on Mt. Spokane is an undescribed species.

These species indicate that there are may be many other unique forest invertebrate species on Mt. Spokane whose habitat is the area proposed for expansion, species that may not be found anywhere else in eastern Washington, perhaps even the Pacific Northwest.

Schoville & Graening (2013)* have recently ranked the Mt. Spokane *Grylloblatta* population as Endangered under the listing guidelines for the International Union for the Conservation of

Nature (IUCN). Their determination of the population's status as Endangered is based on the population's

probable small size and area extent, geographic isolation from other known populations, probable ancient age, and its unique species or subspecies ranking.

Given these important considerations and the possible high vulnerability of the Mt. Spokane *Grylloblatta* population to forest modification and soil disturbance, including the expected changes in the thermal characteristic of its habitat due to forest clearing, we request that the EIS include an analysis of the probable impacts of the ski area expansion on this unique flightless insect.

Thank you. Sincerely,

James Bergdahl, PHDC

jcbergdahl@gmail.com

*Schoville, S.D. & G.O. Graening, 2013. Updated checklist of the ice-crawlers (Insecta: Grylloblattodea: Grylloblattidae) of North America, with notes on their natural history, biogeography and conservation. Zootaxa 3737: 351-378. <http://dx.doi.org/10.11646/zootaxa.3737.4.2>

An introduction to the *Grylloblatta* literature, and photos of the insect, can be found online by googling "grylloblatta", "grylloblattidae", or "ice crawlers".



December 2, 2013

Randy Kline, Environmental Program Manager
Washington State Parks and Recreation Commission
1111 Israel Road SW, Tumwater, WA 98501
PO Box 42650, Olympia, WA 98504

Dear Mr. Kline,

I had the opportunity to attend the Washington State Park Commission hearing on November 14, 2013 in Gig Harbor, Washington. I want to thank the Commission for voting to continue the process of classification.

Over the last decade, we've made a great deal of progress, completing a significant public process, conducting extensive studies and receiving overwhelming public support. Just this past summer we completed environmental studies that will provide the Commission considerably more data than previously available to help inform the classification decision.

Classification Action

As President of the Board of Directors for MS2000, and as directed by the MS2000 Board of Directors, I respectfully request the Commission to classify all Potential Alpine Ski Expansion Area (PASEA) acreage above the Chair 4 Road as Recreation for the following reasons:

1. The public has been skiing in the winter and recreating year-round in this area since the State Park and ski area was created in the 1930's and should be allowed to continue to do so.
2. The major difference between the PASEA and the rest of the State Park is that the PASEA is the ONLY area within the State Park where alpine skiing can expand. Last year Mt. Spokane Ski and Snowboard Park exceeded 100,000 skier visits! This growing number of guests needs larger areas in which to ski and board to decrease trail densities making skiing and snowboarding safer for all.
3. The PASEA area is also different from other NFA acreage within the park because it already has horse trails, hiking trails, biking trails, cell towers, buildings, dirt roads and a paved road to the summit.
4. In 1999 State Parks came to Spokane with the idea of classifying 20% of Mt. Spokane State Park as NFA and the Proposed Alpine Ski Expansion Area (PASEA) was considered to be part of that allocation. Citizens of Spokane

were strongly opposed to this idea and the classification was tabled. Since then State Parks has classified 28% of Mt. Spokane State Park as NFA (4,000 acres). That is nearly 50% more than State Park's original classification intent. Clearly Mt. Spokane State Park has enough land classified as NFA without needing to lock



up land that has been skied and recreated in by the citizens of Spokane for generations in activities that would, under a NFA classification, be prohibited.

5. The intention of the land gifted to create the State Park was for the purpose of recreation and open public access, not stay-out preservation. In fact, testimony has been given by the family that gifted 320 acres of land within the PASEA that was dedicated specifically for the purpose of recreation and open public access.
6. For the safety of our guests, ski patrol operations would be greatly enhanced with land classification of Recreation.

Project Action

As President of the Board of Directors for MS2000, and as directed by the MS2000 Board of Directors, I respectfully request:

The Washington State Parks and Recreation Commission classify the 279 acres within the Project Action area as Recreation, which is consistent with the rest of the alpine trails within the ski area. Our guests do not know when they are, or might be, moving from one classification to another and, as guests of the State Park and ski area, must assume and expect the terrain to be managed in a safe, consistent manner as is standard and consistent with all other ski areas. Our priority is, and must be, the safety of our visitors.

On behalf of the MS2000 Board of Directors I thank you for all the time and attention you have given to this very important matter for the future and continued success of the Mt. Spokane Ski and Snowboard Park. Please know, as a Board of Directors, we are "all in" and fully committed to the balancing of environmental stewardship with recreational opportunity to support the future success of the Mt. Spokane Ski and Snowboard Park and the Washington State Parks and Recreation system. Thank you.

Sincerely,

Jim Meyer
President, Mt. Spokane 2000
(509) 990.9662

Cc: MS2000 Board of Directors

Tammy Jensen
John Morrow
Bruce Toillion
Caren Furbeyre
Craig Lee
Pete Fortin

General Manager
Brad McQuarrie

Rob Crick
Steve Lamberson
Gloria Fletcher
David Rowand
Jim Slack
Brooke Ellingwood

Washington State Park and Recreation Commissioners
Governor



Senators
State Representatives
Spokane County Commissioners



Please find attached the Pacific Northwest Ski Areas Association Comments letter regarding the Mount Spokane State Park Land Classification for the Potential Alpine Ski Expansion Area. Please don't hesitate to contact me if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'John', with a stylized flourish at the end.

John A. Gifford

President, PnsAA

P: 877-533-5520 f: 877-559-2847 C: 206-601-2576 e:

john@pnsaa.org W: www.pnsaa.org

PO Box 758, La Conner, WA 98257



Post Office Box 758
La Conner, WA 98257
877.533.5520 (voice)
877.559.2847 (fax)
www.pnsaa.org

December 6, 2013

Mr. Randy Kline
Environmental Program Manager
Washington State Parks & Recreation Commission
PO Box 42650
Olympia, Washington 98504-2650

RE: Mount Spokane Potential Alpine Ski Expansion Area (PASEA) Land Classification

Dear Mr. Kline:

The Pacific Northwest Ski Areas Association (PNSAA) is a non-profit trade association representing the interests of ski and snowboard facilities in Washington, Idaho, Oregon, Montana, Northern California and Alaska. The Association's 34 member ski areas – mostly recreation providers operating on state and federally managed land – collectively host an average 5.5 million visits annually.

On behalf of the PNSAA Board of Directors, I write to provide Comments on the purposes and need for formal land classification pursuant to Washington Administrative Code (WAC) 352-16 for the approximately 850 acre area known as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park. PNSAA supports and urges adoption of Option 2, designation of 279 acres of the PASEA as "Recreation Area" allowing the higher intensity use as proposed by Mount Spokane 2000 (i.e., lift served alpine skiing) and more extensive facilities development (e.g., ski lift, alpine ski trails). This is the same classification as the existing ski area.

PNSAA believes in order for Mount Spokane Ski and Snowboard Park to catch up with guest expectations and capacity issues, the "Recreational Area" land classification is crucial so the operators can proceed with the proposed expansion to meet these considerable challenges by enhancing the overall functionality of the facility.

Marketplace Growth

The population of Washington State has experienced five decades of strong, uninterrupted growth. The 2010 U.S. Census revealed the following statistics about the period 2000-2010:

- ☐ population growth of 830,419 (a 14.1 percent increase);
- ☐ Washington becomes the 13th most populous state in the U.S. (up from 15th place), tallies a 2010 population of 6,724,540, and enables the state's Congressional delegation grows by one member;
- ☐ Washington becomes the 8th fastest growing state in the U.S. (in terms of numeric increase); and
- ☐ The population distribution between eastern Washington and western Washington remains unchanged with the same 22/78 percent split in place since 2000.

Visits to ski areas will grow as population grows. By year 2030, Washington is projected to have a population of 8.6 million. With a growing population, the maturing of the 'echo boomers' (i.e., offspring of the 'baby boomers'), and the growth in the early retiree age cohort (i.e., 50 to 65 years of age), ski industry analysts expect unprecedented, demographic pressure to be applied to the state's winter sports facilities, especially facilities in close proximity to population centers like Spokane and Spokane Valley, Currently:

- ☐ The health of the overall industry is strong – average annual visits for the last three years (2010/2011 through 2012/2013) at Washington ski resorts is more than 2.1 million.
- ☐ Mt. Spokane in the 2012/2013 season had record 104K visits in an average snow year, a 19.7% increase from the 2001/2003.
- ☐ Besides skiing and snowboarding, according to a 2012 report by the Outdoor Recreation Industry Foundation, at least 63% of Washington residents participate in outdoor recreation each year.

These stats illustrate that the public demand for value based, local, day-use recreational opportunities has increased, and given population growth projections will continue to increase. Land suitable for alpine skiing and snowboarding is limited; therefore it is advantageous to make optimal use of the land contiguous to existing public lands that offer developed recreation. Furthermore, the expansion area being considered was in the original vision for Mount Spokane and there was a ski lift in that area at one time in its history therefore land classification as "Recreation Area" is appropriate.

Safe Ski Trail Densities

With the demand for snow sports projected to grow, Washington state ski area operators must size their facilities to ensure adequate capacity for safe and comfortable skiing and snowboarding. Mount Spokane's days of peak attendance in the next decade are projected to be significantly greater than days of peak attendance witnessed in the 1980s and 1990s, largely because of sustained population growth and because a growing number of Mount Spokane's guests are choosing to focus most of their skiing and snowboarding closer to home and on weekends during the months of January and February. As a result, it is vital that Mount Spokane have the ability to expand so the ski facility is able to ensure safe and uncongested ski trails – especially during periods of peak attendance when the majority of Mount Spokane's guest population is comprised of individuals with limited ski and snowboard skills. The Option 2 land classification would provide the opportunity for much needed expansion as Mount Spokane 2000 proposed.

Long-term Economic Sustainability

The "Recreation Area" land classification that will allow expansion into terrain with a northern exposure

overcomes a significant operational challenge – the Mount Spokane trail network is entirely reliant upon south-facing slopes. In most winters, Mt. Spokane's deep snowpack weathers the highly erosive elements of south-facing slopes – namely solar exposure and wind – without detriment to its operation. However, as the winter of 2004-2005 illustrates, ski facilities with south-facing aspects are especially susceptible to dramatic reductions in their operating season in winters of minimal snowfall (e.g., Mt. Spokane had just 29 operating days during the winter of 2004-2005). Expansion into terrain with a northern aspect will not only yield a very high quality recreational experience (i.e., better overall snow quality), it will help add resilience to the financial performance of the ski area by ensuring a longer operating season. During years of modest natural snowfall, north-facing slopes will enjoy more resilient snow packs, which will allow Mt. Spokane to open in time for the holidays and help the facility operate later in the spring.

Recreation Potential of Appropriately Suited Terrain

There are many facets that make ski area operations unique. Topography, slope gradient requirements, solar and wind exposure, avalanche hazard, fish and wildlife habitat restrictions, cultural resources, and vehicular access are just a few of the myriad issues that help determine the suitability of lands for ski area development. Given the complex and controversial approval process associated with the development of new ski areas (recall the Early Winters planning exercise in the 1990s), any increase in Washington state's aggregate ski area capacity likely will necessitate the expansion of the state's network of existing ski facilities. Because land suitable for alpine skiing and snowboarding is so limited, it is important to make optimal use of the land contiguous to existing ski areas. The land classification of 279 acres in the PASEA as "Recreation Area" deserves full consideration and formal environmental review – in accordance with the State Environmental Policy Act (SEPA).

Accordingly, the PNSAA Board of Directors, pursuant to Washington Administrative Code 352-16, urges adoption of Option 2 - designation of 279 acres of the PASEA as "Recreation Area" allowing the higher intensity use as proposed by Mount Spokane 2000.

If you have questions, or if I can clarify any of these Commentss, please do not hesitate to contact me at (877) 533-5520. Regards,

PACIFIC NORTHWEST SKI AREAS ASSOCIATION

A handwritten signature in black ink, appearing to read "John A. Gifford". The signature is fluid and cursive, with a large initial "J" and "G".

John A. Gifford
President

cc: Brad McQuarrie



Kettle Range

CONSERVATION GROUP

Protecting the forests and wildlife of the Columbia Highlands since 1976

December 10, 2013

Washington Parks and Recreation Commission

Attention: Randy Kline

Environmental Program Coordinator

1111 Israel Road S.W. Olympia,

WA 98504-2650

Via email at: randy.kline@parks.wa.gov

Re: Environmental Impact Statement for the expansion of Mt Spokane Ski Area

Dear Coordinator:

On behalf of the Board of Directors and membership of Kettle Range Conservation Group, I submit the following Commentss regarding management of Mt. Spokane State Park. Our group's members enjoy recreating in the Park and are very concerned about conservation of its natural resources and we are in favor of protecting Blanchard Creek as a designated Natural Forest. Specifically, we are concerned about the proposed ski area expansion into the irreplaceable old growth forest on the west side of the mountain.

The Washington Department of Fish & Wildlife raised concerns about proposed logging plans that would create a new ski run in an area of old growth forest that is currently outside the "footprint" of the Mt. Spokane Ski Area. How will expansion the ski area impact sensitive species of old growth dependent species, such as goshawk, lynx and Great Gray Owl? What are the impacts of snow-making to these focal species? Please consult with U.S. Fish & Wildlife Service regarding potential impacts to threatened, endangered and sensitive species.

A Master Concession Plan was to be part of the Mt. Spokane Master Facility Plan, but has never been completed. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically.

We do not support expansion of Mt. Spokane Ski Area as proposed. The Ski Area should be held to a higher standard for improving their existing ski area and facilities. How can a new ski run fix the existing condition of their aging infrastructure and poorly designed ski runs? Their ski area expansion proposal will be a cost born by the citizens of Washington in the form of lost recreation experience – not a gain.

The Spokane County Critical Areas Ordinance requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be

mitigated or compensated for, therefore it should not be allowed.

I look forward to hearing from you regarding concerns raised in this scoping letter. Sincerely,


Timothy J. Coleman
Executive Director

POB 150 Republic, WA 99166 • (509) 775-2667 • tcoleman@kettlerange.org www.kettlerange.org

Comments: At it's regular meeting of December 9, 2013 the Board of the 35 member Inland Northwest Trails Coalition (INTC) resolved to Comments on the PASEA/EIS. Attached is a letter summarizing our interests.

Thank you for you work on this. Lunell Haught
President, INTC



Lunell Haught, PhD
President

Barbee J. Scheibner
Vice President
Jeff Lambert
Secretary

Paul Kropp
Treasurer

Kerry Brooks, PhD

Bryan Bussard

Loren Dudley

Todd Dunfield

Karen Jurasin

Derrick Knowles

Jerry Krause

Erika Prins

Daniel J. Schaffer, MD

December 10, 2013

Randy Kline

Washington Parks and Recreation Commission
Environmental Program Coordinator

Via electronic mail

RE: Mt. Spokane Scoping Comments

The Inland Northwest Trails Coalition urges you to include two items in your consideration:

1. The impact of developing a ski area in the PASEA property should be evaluated based on its impact to all forms of non-motorized activity throughout the year.
2. An alternative that should be considered is to do nothing, to leave the PASEA as it currently is with non-motorized activity, but no new runs, simply improve the existing runs as necessary.

We appreciate the opportunity to Comments on this important issue.

Lunell Haught

Lunell Haught
PO Box 3331 Spokane, WA 99220

Inlandnorthwesttrails.org

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed.

Comments: Any decision by Washington State Parks & Recreation Commission must allow the proposed chairlift and seven runs to proceed

Comments: I am just a regular person who has lived in Spokane my whole life. My grandfather was one of the first to log in this area so I have our forests in my blood you can say. I don't have a bunch of scientific reason why you should not expand the ski area into old growth virgin forest. I think the fact that we have a little bit of old growth virgin forest left is kind of enough. I know people who have reasons that make sense to me and I will list those below. Ultimately, I appeal to you to not continue the expansion of the ski area and leave the old growth alone. I love skiing. My first ski hill was Mt. Spokane. I am glad to have it. I know the ski area can make a lower impact area if they really want ski access to that side of the mountain. Ultimately I don't think they need it. Thank you for your consideration. Let me know if there is more that I can do to influence your decision. Below is a group of bullet points that may be more compelling than my above email.

The **Spokane County Critical Areas Ordinance** requires mitigation and compensation of impacts caused by development. The loss of the largest stand of old growth in Spokane County cannot be mitigated or compensated for, therefore it should not be allowed.

A **Master Concession Plan** was to be part of the Mt. Spokane Master Facility Plan, but has never been completed. Without a hard look at the economic and social impacts of the operation of the ski area, it will be impossible to know if installing a new lift and runs makes sense economically.

Address **concerns raised by the Spokane County Hearing Examiner** when he ruled against a timber harvest permit earlier this year.

Analyze all the **concerns raised by the Washington Dept. of Fish and Wildlife (WDFW)**.

Analyze all the **concerns of the Department of Natural Resources' WA Natural Heritage Program** who favors protection as the Blanchard Creek Natural Forest.

Consult with WDFW and US Fish and Wildlife Service on focal species, lynx, wolverine, and goshawk. A habitat management plan is required, as are surveys for rare and sensitive plants.

A **qualified biologist** should be consulted to delineate the location and impacts of the proposed development on wetlands and water courses. What are the impacts of snow-making to the above?

Analyze the **impacts of leaving logging debris**, which can attract pine bark beetle and spread white pine blister rust?

Analyze the **impacts on a rare species**, *Grylloblatta* now that an "independent expert" has determined that the populations deserve International Union for Conservation of Nature "Endangered" status. They have been found within the flagged line of the proposed chairlift.

Analyze the **impacts on clearing, grading and exposing soil** that could result in noxious weeds, sedimentation into Blanchard Creek, and damage to riparian area vegetation.

Analyze how **expanding into the west side of the mountain will extend the season** and bring in more skiers when they have an underutilized north-side lift.

Analyze and determine the **cost of adding intermediate runs** to the existing footprint as opposed to creating new ones.

Analyze the **impacts of the loss of key corridors and core wildlife areas**. How will they be mitigated? What about direct loss of habitats for sensitive flora and fauna, can they be mitigated? What is the mitigation for the loss of biodiversity?

We support and want analysis of a **no-action alternative** that will designate the proposed ski expansion areas (PASEA) area as Natural Forest Forest.

How will **night time lights impact wildlife** and can you mitigate those for nocturnal species?



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

December 11, 2013

Mr. Randy Kline
Environmental Program Manager
Washington State Parks and Recreation Commission
P.O. Box 42650
Olympia, WA 98504-2650

Re: Potential Alpine Ski Expansion Area

(PASEA) Dear Mr. Kline:

Thank you for the opportunity to Comments on the Scope of an Environmental Impact Statement regarding the classification of approximately 850 acres known as the Potential Alpine Ski Expansion Area (PASEA) at Mount Spokane State Park (Proponent-Washington State Parks and Recreation Commission). The Department of Ecology has reviewed the documents and submits the following Commentss:

Shorelands and Environmental Assistance Program-Wetlands

Wetlands are known to exist in the project area. The Environmental Impact Statement must consider and mitigate for impacts to wetlands if the project will impact a wetland or wetland buffer. Impacts to wetlands will require permitting from the Department of Ecology (401 Certification or Administrative Order) and may require permitting from the U.S. Army Corps of Engineers (Section 404) depending on what the wetland drains to. Contact David Moore at (509) 329-3474 for more information.

State Environmental Policy Act (SEPA)

Ecology's Commentss are based upon the information submitted for review. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Sincerely,
Cindy Anderson for:

A handwritten signature in black ink, appearing to read "Terri Costello".

Terri Costello SEPA Coordinator Phone: (509) 329-3550
Email: temi461@ecy.wa.gov 201305533